

Exhibit R

to
Webb Declaration

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. C07-5944 SC

MDL NO. 1917

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

This Document Relates To:

INDIRECT PURCHASER ACTION

**DEFENDANT HITACHI ASIA, LTD.'S
OBJECTIONS AND RESPONSES TO
SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS
FROM INDIRECT PURCHASER
PLAINTIFFS**

PROPOUNDING PARTY: INDIRECT PURCHASER PLAINTIFFS

RESPONDING PARTIES: HITACHI ASIA, LTD.

SET NUMBER: SECOND (Nos. 1-46)

Defendant Hitachi Asia, Ltd. ("Responding Party") hereby timely objects and responds to Indirect Purchaser Plaintiffs' ("Plaintiffs" or "Requesting Party") Second Set of Requests for the Production of Documents ("Document Requests") served on March 25, 2010, and each document

request set forth therein (“Responses”), as follows.

GENERAL OBJECTIONS

1. Responding Party’s responses are based upon information and writings available to and located by Responding Party as of the date of service of these Responses. Responding Party has not completed its investigation of the facts relating to the Document Requests, and all of the information supplied and documents and things produced are based only on such information and documents that are reasonably available and specifically known to Responding Party as of the date of service of its response.

2. No express, incidental or implied admissions are intended by these Responses. The fact that Responding Party agrees to provide information in response to a particular request is not intended and shall not be construed as an admission that Responding Party accepts or admits the existence of any such information set forth in or assumed by such request, or that any such information and/or document constitutes admissible evidence. The fact that Responding Party agrees to provide information in response to a particular request is not intended and shall not be construed as a waiver by Responding Party of any part of any objection to such request or any part of any general objection made herein.

3. Responding Party reserves the right to change, amend, or supplement its objections at a later date. If Plaintiffs assert an interpretation of any aspect of the Document Requests or any of the requests therein that is different from that made by Responding Party, Responding Party reserves the right to supplement its objections if such interpretations made by Plaintiffs are held to be applicable.

4. Responding Party objects to the Document Requests, and each request therein, to the extent they are vague, ambiguous, or contain terms that are insufficiently defined.

5. Responding Party objects to the Document Requests, and each request therein, as overly broad, unduly burdensome, oppressive and beyond the proper scope of discovery.

6. If multiple, identical copies of any document are responsive to the requests herein, only one representative copy will be produced. Producing more than one identical copy is unduly burdensome and oppressive.

1 7. Responding Party objects to the Document Requests, and each request therein, to
2 the extent they seek documents and materials on matters not relevant to the subject matter of this
3 action, not admissible in evidence, and not reasonably calculated to lead to the discovery of
4 admissible evidence.

5 8. Responding Party objects to the Document Requests, and each request therein, to
6 the extent they seek to impose on it discovery obligations inconsistent with, or not authorized
7 under, the Federal Rules of Civil Procedure or the Federal Rules of Evidence.

8 9. Responding Party objects to the Document Requests, and to each request therein,
9 to the extent they seek to impose on it discovery obligations inconsistent with, or not authorized
10 under the Local Rules of the United States District Court in and for the Northern District of
11 California (the "Local Rules").

12 10. Responding Party objects to the Document Requests, and to each request therein,
13 to the extent they seek to impose on it discovery obligations exceeding the scope of the
14 Stipulation and Order to Extend Limited Discovery Stay that the Court entered on January 5,
15 2010 (the "Stay Order").

16 11. Responding Party objects to the Document Requests, and each request therein, to
17 the extent they seek documents and information that are beyond the scope of the Sherman
18 Antitrust Act, 15 U.S.C. § 1.

19 12. Responding Party objects to the Document Requests, and each request therein, to
20 the extent they fail to describe the documents and things sought with a reasonable degree of
21 specificity.

22 13. Responding Party shall attempt to construe the terms and phrases used by
23 Plaintiffs in a way to give those terms and phrases a meaning which will result in the production
24 of relevant information or information designed to lead to the discovery of admissible evidence.

25 14. Responding Party objects to the Document Requests, and each request therein, to
26 the extent they seek the discovery of documents regarding Responding Party's sales outside of the
27 United States and unrelated to United States commerce, as such sales are beyond the scope of this

1 litigation and thereby render the Document Requests overly broad, unduly burdensome, and not
2 reasonably calculated to lead to the discovery of admissible evidence.

3 15. Responding Party objects to the Document Requests, and each request therein, to
4 the extent they seek documents, including but not limited to electronic documents, the disclosure
5 of which is prohibited by a law, regulation, or order of a court or other authority of a foreign
6 jurisdiction in which the documents are located.

7 16. Responding Party objects to the Document Requests, and each request therein, to
8 the extent they seek documents that are no longer active or readily accessible on Responding
9 Party's database but might exist in electronic archives or back-up files. Responding Party will
10 not rebuild these electronic archives and back-up files in order to search for documents that may
11 be responsive to the Document Requests. Based on the dates of the information sought, a portion
12 of Responding Party's potential responsive data will likely not be on active databases.

13 17. Responding Party objects to the Document Requests, and each request therein, to
14 the extent they seek to impose on Responding Party an obligation to investigate or discover
15 information or materials from third-parties or sources who are equally accessible to Plaintiffs.

16 18. Responding Party objects to the Document Requests and each request therein, to
17 the extent they contain duplicative requests, in whole or in part. To the extent responsive
18 documents have previously been produced, they will not be produced again.

19 19. Responding Party objects to the Document Requests, and each request therein, to
20 the extent that they purport to call for Responding Party to engage in an investigation or to obtain
21 information and/or documents not in its personal possession, custody or control. In addition,
22 Responding Party objects to the extent the Document Requests require Responding Party to
23 respond and/or produce documents on behalf of any person or entity other than itself.

24 20. Responding Party objects to the Document Requests, and each request therein, to
25 the extent that they seek documents that are in the public record or which are equally accessible to
26 the Plaintiffs as to Responding Party.

27 21. Responding Party objects to the Document Requests, and each request therein, to
28 the extent that they attempt and/or purport to call for production of any information and/or

documents that are privileged, including, but not limited to, documents and materials that were prepared in anticipation of litigation, ADR, or for trial, that reveal communications between Responding Party and its legal counsel, and/or that otherwise constitute attorney-work product, joint defense or common interest privilege, or by any other applicable doctrine or privilege, or that are otherwise privileged or immune from discovery. Inadvertent testimony, production, or disclosure of any such information and/or document is not intended to and shall not constitute a waiver of any privilege or any other ground for objecting to discovery with respect to such testimony, information, and/or document, or with respect to the subject matter thereof. Nor shall such inadvertent production or disclosure waive Responding Party's right to object to the use of any such testimony, information, and/or document during this action or in any other or subsequent proceeding. Hence, Responding Party objects to each request to the extent each seeks testimony, documents, and information that are protected by the attorney-client privilege and/or the attorney work product doctrine.

22. No response herein should be deemed or construed as a representation that Responding Party agrees with or acquiesces in the characterization of any fact, assumption or conclusion of law contained in or implied by the Document Requests.

23. Responding Party objects to the Document Requests, and each request therein, to the extent they seek information and/or documents that would disclose proprietary information, trade secrets or other confidential research, development, or other confidential information protected by the Uniform Trade Secrets Act, among others, any and all rights of privacy under the United States Constitution or Article I of the Constitution of the State of California, or any other applicable law or state constitution, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities. Where applicable, Responding Party's Responses to the Document Requests are subject to the provisions of the Stipulated Protective Order that the Court entered on June 18, 2008 (the "Protective Order"). Responding Party's Responses are hereby designated "Confidential" in accordance with the provisions of the Protective Order.

24. By representing that it will or will not produce documents, Responding Party does not represent that such documents exist.

25. To the extent Responding Party produces to Direct Purchaser Plaintiffs documents responsive to the Document Requests, such responsive documents will not be produced again.

26. Subject to and without waiving any of the foregoing objections, each of which is expressly incorporated into each individual response below as if fully stated therein, Responding Party expressly reserves the following rights:

a. Any and all testimony and information provided and/or documents produced by Responding Party in response to the Document Requests are and will remain subject to all objections as to relevance, materiality, propriety, and admissibility, as well as to any and all other objections on any grounds that would require the exclusion of the testimony, information, and/or document or any portion thereof if such testimony, information, and/or document was offered in evidence, all of which objections and grounds are hereby expressly reserved and may be interposed at the time of any written discovery, deposition, or at or before any hearing, arbitration or trial in this matter;

b. The right to object on any ground whatsoever at any time to any demand for further responses to the Document Requests or any other discovery procedures involving or relating to the subject matter of the Document Requests; and

c. The right to supplement the documents produced, or otherwise to supplement, revise or explain the information contained therein in light of information gathered through further investigation and discovery.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

DEFINITION NO. 1:

“All” should be construed to include the collective as well as the singular and shall mean “each,” “any,” and “every.”

OBJECTION TO DEFINITION NO. 1:

No objection.

DEFINITION NO. 2:

“Any” shall be construed to mean “any and all.”

OBJECTION TO DEFINITION NO. 2:

No objection.

DEFINITION NO. 3:

“Or” and “and” should be construed so as to require the broadest possible response. If, for example, a request calls for information about “A or B” or “A and B,” you should produce all information about A and all information about B, as well as information about A and B collectively. In other words, “or” and “and” should be read as “and/or.”

OBJECTION TO DEFINITION NO. 3:

No objection.

DEFINITION NO. 4:

“Including” is used to illustrate only, and should not be construed as limiting in any way.

OBJECTION TO DEFINITION NO. 4:

No objection.

DEFINITION NO. 5:

“Defendant” means any company, organization, entity or person originally, presently or subsequently named as a defendant in this litigation, as well as each such Defendant’s predecessors, successors, subsidiaries, departments, division and/or affiliates. “Defendant” also includes Daewoo International Corporation, Daewoo Electronics Corporation, Orion Electric Company, Daewoo-Orion Société Anonyme, Tatung Company, Panasonic Consumer Electronics Company, MT Picture Display Corporation of America (New York), MT Picture Display Corporation of America (Ohio), MT Picture Display (Malaysia) Sdn. Bhd., MT Picture Display (Thailand) Co., Ltd., PT.MT Picture Display Indonesia, Matsushita Electronic Corporation (Malaysia) Sdn. Bhd., Toshiba Display Devices (Thailand) Company, Ltd., LG.Philips Displays, Philips Consumer Electronics Co., Shenzhen SEG Hitachi Color Display Devices Co., Ltd., Thomson S.A., TCL International Holdings, Ltd., TCL Corporation, TCL-Thomson Electronics (“TTE”) Corporation, Hua Fei Colour Display Systems Company Limited, and each such

1 Defendant's predecessors, successors, subsidiaries, departments, divisions or affiliates.

2 **OBJECTION TO DEFINITION NO. 5:**

3 Responding Party objects to this definition to the extent it attempts to impose obligations
4 on Responding Party and/or seeks documents beyond those required to be produced pursuant to
5 the Federal Rules of Civil Procedure.

6 Responding Party objects to this definition on the ground it calls for a legal conclusion.

7 Responding Party objects to this definition as vague, ambiguous, unintelligible, overly
8 broad to the extent it seeks documents and information that are not relevant to the subject matter
9 of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of
10 admissible evidence, and unduly burdensome to search for and produce.

11 Responding Party objects to this definition to the extent it seeks information and
12 documents that would disclose Responding Party's or a third party's respective trade secrets or
13 other confidential research, development, or confidential information protected by the Uniform
14 Trade Secrets Act, any and all rights of privacy under the United States Constitution or Article
15 One of the Constitution of the State of California, or any other applicable state constitution or
16 law, or which is otherwise prohibited from disclosure because to do so would cause Responding
17 Party to violate legal or contractual obligations to any other persons or entities. Where it may be
18 appropriate to do so and with adequate protections and limitations, Responding Party expressly
19 reserves the right to provide such documents and/or information only pursuant to the Protective
20 Order in this action.

21 Responding Party objects to this definition to the extent that it attempts or purports to call
22 for the production of any information and/or documents that are privileged, that were prepared in
23 anticipation of litigation or trial, that reveal communications between Responding Party and its
24 legal counsel, that otherwise constitute attorney work product, are subject to the joint defense or
25 common interest privilege, or that are otherwise privileged or immune from discovery.

26 Responding Party objects to this definition to the extent it is intended to include persons
27 or entities other than Responding Party. To the extent and in the context a request uses the term
28 "Defendant," Responding Party understands that the request and its obligations only extend to

1 information and/or documents within Responding Party's possession, custody or control.

2 Responding Party objects to this definition to the extent that it calls for documents or
3 information beyond Responding Party's knowledge. In addition, Responding Party objects to this
4 definition to the extent that it requires Responding Party to respond and/or produce documents or
5 information on behalf of any person or entity other than itself.

6 Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

7 **DEFINITION NO. 6:**

8 "Document(s), data, and tangible things" is used in the broadest possible sense and has the
9 meaning set forth in Federal Rule of Civil Procedure 34 including, but not limited to: writings;
10 records; files; correspondence; reports; memoranda; calendars; diaries; minutes; electronic
11 messages; voicemail; E-mail; telephone message records or logs; computer and network activity
12 logs; hard drives; backup data; removable computer storage media such as tapes, disks, and cards;
13 printouts; document image files; Web pages; databases; spreadsheets; software; books; ledgers;
14 journals; orders; invoices; bills; vouchers; checks; statements; worksheets; summaries;
15 compilations; computations; charts; diagrams; graphic presentations; drawings; films; charts;
16 digital or chemical process photographs; video, phonographic, tape, or digital recordings or
17 transcripts thereof; drafts; jottings; and notes. Information that serves to identify, locate, or link
18 such material, such as file inventories, file folders, indices, and metadata, is also included in this
19 definition.

20 **OBJECTION TO DEFINITION NO. 6:**

21 Responding Party objects to this definition to the extent that it seeks to expand the scope
22 of Rule 34 of the Federal Rules of Civil Procedure.

23 Responding Party also objects to this definition as overly broad to the extent it seeks
24 documents and/or information that are not relevant to the subject matter of this action, not
25 admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence,
26 and unduly burdensome to search for and produce.

27 **DEFINITION NO. 7:**

28 "All Documents" means every document and every non-identical copy known to you and

every such document or writing which you can locate or discover by reasonably diligent efforts, including, but not limited to, all drafts of documents now in the possession, custody or control of any defendant, its merged or acquired predecessors, former and present directors, officers, counsel, agents, employees and/or persons acting on its behalf.

OBJECTION TO DEFINITION NO. 7:

Responding Party objects to this definition to the extent that it seeks to expand the scope of Rule 34 of the Federal Rules of Civil Procedure.

Responding Party also objects to this definition as overly broad to the extent it seeks documents and/or information that are not relevant to the subject matter of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence, and unduly burdensome to search for and produce.

Responding Party objects to this definition to the extent it is intended to include persons or entities other than Responding Party. Responding Party understand that these requests and its obligations only extend to information and/or documents within Responding Party's possession, custody or control.

Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

DEFINITION NO. 8:

"Electronically stored information" ("ESI") has the same full meaning as construed by Fed. R. Civ. P. 26 and 34 and includes, without limitation, the following:

- a. activity listings of electronic mail receipts and/or transmittals;
- b. output resulting from the use of any software program, including without limitation word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, AOL Instant Messenger (or similar program) or bulletin board programs, operating systems, source code, PRF files, PRC files, batch files, ASCII files, and all miscellaneous media on which they reside and regardless of whether such electronic data exist in an active file, deleted file, or file fragment;
- c. any and all items stored on computer memories, hard disks, floppy disks, CD-ROM, magnetic tape, microfiche, or on any other vehicle for digital data storage and/or

transmittal, including without limitation a personal digital assistant, e.g., Palm Pilot, Blackberry, Treo or other device.

OBJECTION TO DEFINITION NO. 8:

Responding Party objects to this definition to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party also objects to this definition as overly broad to the extent it seeks documents and/or information that are not relevant to the subject matter of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence, and unduly burdensome to search for and produce.

Responding Party objects to this definition to the extent it seeks documents that are no longer active or readily accessible on Responding Party's database but might exist in electronic archives or back-up files. Responding Party will not rebuild these electronic archives and back-up files in order to search for documents that may be responsive to the Document Requests. Based on the dates of the information sought, a portion of Responding Party's potential responsive data will likely not be on active databases.

DEFINITION NO. 9:

"You," "your" or "your company" means the Defendant responding to these Requests, its predecessors, successors, subsidiaries, departments, divisions and/or affiliates, including without limitation any organization or entity which the responding Defendant manages or controls, together with all present and former directors, officers, employees, agents, representatives, or any persons acting or purporting to act on behalf of the responding Defendant.

OBJECTION TO DEFINITION NO. 9:

Responding Party objects to this definition to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects to this definition on the ground it calls for a legal conclusion.

Responding Party objects to this definition as vague, ambiguous, unintelligible, overly

1 broad to the extent it seeks documents and information that are not relevant to the subject matter
2 of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of
3 admissible evidence, and unduly burdensome to search for and produce.

4 Responding Party objects to this definition to the extent it seeks documents and
5 information that would disclose Responding Party's or a third party's respective trade secrets or
6 other confidential research, development, or confidential information protected by the Uniform
7 Trade Secrets Act, any and all rights of privacy under the United States Constitution or Article
8 One of the Constitution of the State of California, or any other applicable state constitution or
9 law, or which is otherwise prohibited from disclosure because to do so would cause Responding
10 Party to violate legal or contractual obligations to any other persons or entities. Where it may be
11 appropriate to do so and with adequate protections and limitations, Responding Party expressly
12 reserves the right to provide such information and/or documents only pursuant to the Protective
13 Order in this action.

14 Responding Party objects to this definition to the extent that it attempts or purports to call
15 for the production of any documents and/or information that are privileged, that were prepared in
16 anticipation of litigation or trial, that reveal communications between Responding Party and its
17 legal counsel, that otherwise constitute attorney work product, are subject to the joint defense or
18 common interest privilege, or that are otherwise privileged or immune from discovery.

19 Responding Party objects to this definition to the extent it is intended to include persons
20 or entities other than Responding Party. To the extent and in the context a request uses the term
21 "Defendant," Responding Party understands that the request and its obligations only extend to
22 documents and/or information within Responding Party's possession, custody or control.

23 Responding Party objects to this definition to the extent that it calls for documents and/or
24 information beyond Responding Party's knowledge. In addition, Responding Party objects to this
25 definition to the extent that it requires Responding Party to respond and/or produce documents
26 and/or information on behalf of any person or entity other than itself.

27 Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

DEFINITION NO. 10:

“Subsidiary,” “affiliate” and “joint venture” refer to any entity or person in which you have any financial or ownership interest.

OBJECTION TO DEFINITION NO. 10:

Responding Party objects to this definition to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects to this definition on the ground it calls for a legal conclusion.

Responding Party objects to this definition as vague, ambiguous, unintelligible, overly broad to the extent it seeks documents and information that are not relevant to the subject matter of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence, and unduly burdensome to search for and produce.

Responding Party objects to this definition to the extent it seeks documents and information that would disclose Responding Party’s or a third party’s respective trade secrets or other confidential research, development, or confidential information protected by the Uniform Trade Secrets Act, any and all rights of privacy under the United States Constitution or Article One of the Constitution of the State of California, or any other applicable state constitution or law, or which is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal or contractual obligations to any other persons or entities. Where it may be appropriate to do so and with adequate protections and limitations, Responding Party expressly reserves the right to provide such information and/or documents only pursuant to the Protective Order in this action.

Responding Party objects to this definition to the extent that it attempts or purports to call for the production of any documents and/or information that are privileged, that were prepared in anticipation of litigation or trial, that reveal communications between Responding Party and its legal counsel, that otherwise constitute attorney work product, are subject to the joint defense or common interest privilege, or that are otherwise privileged or immune from discovery.

Responding Party objects to this definition to the extent it is intended to include persons

1 or entities other than Responding Party. To the extent and in the context a request uses the term
 2 “Defendant,” Responding Party understands that the request and its obligations only extend to
 3 documents and/or information within Responding Party’s possession, custody or control.

4 Responding Party objects to this definition to the extent that it calls for documents and/or
 5 information beyond Responding Party’s knowledge. In addition, Responding Party objects to this
 6 definition to the extent that it requires Responding Party to respond and/or produce documents
 7 and/or information on behalf of any person or entity other than itself.

8 Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

9 **DEFINITION NO. 11:**

10 “Person” shall refer to natural persons, firms, joint owners, associations, companies,
 11 partnerships, joint ventures, corporations, trusts, estates, agencies, departments or bureaus
 12 (governmental or private), and any other form of business, governmental or juridical person or
 13 legal entity.

14 **OBJECTION TO DEFINITION NO. 11:**

15 Responding Party objects to this definition to the extent it attempts to impose obligations
 16 on Responding Party and/or seeks documents beyond those required to be produced pursuant to
 17 the Federal Rules of Civil Procedure.

18 Responding Party objects to this definition on the ground it calls for a legal conclusion.

19 Responding Party objects to this definition as vague, ambiguous, unintelligible, overly
 20 broad to the extent it seeks documents and information that are not relevant to the subject matter
 21 of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of
 22 admissible evidence, and unduly burdensome to search for and produce.

23 Responding Party objects to this definition to the extent it seeks information and
 24 documents that would disclose Responding Party’s or a third party’s respective trade secrets or
 25 other confidential research, development, or confidential information protected by the Uniform
 26 Trade Secrets Act, any and all rights of privacy under the United States Constitution or Article
 27 One of the Constitution of the State of California, or any other applicable state constitution or
 28 law, or which is otherwise prohibited from disclosure because to do so would cause Responding

1 Party to violate legal or contractual obligations to any other persons or entities. Where it may be
 2 appropriate to do so and with adequate protections and limitations, Responding Party expressly
 3 reserves the right to provide such information and/or documents only pursuant to the Protective
 4 Order in this action.

5 Responding Party objects to this definition to the extent that it attempts or purports to call
 6 for the production of any documents and/or information that are privileged, that were prepared in
 7 anticipation of litigation or trial, that reveal communications between Responding Party and its
 8 legal counsel, that otherwise constitute attorney work product, or that are otherwise privileged or
 9 immune from discovery.

10 Responding Party objects to this definition to the extent it is intended to include persons
 11 or entities other than Responding Party. To the extent and in the context a request uses the term
 12 "Person," Responding Party understands that the request and its obligations only extend to
 13 documents and/or information within Responding Party's possession, custody or control.

14 Responding Party objects to this definition to the extent that it calls for documents and/or
 15 information beyond Responding Party's knowledge. In addition, Responding Party objects to this
 16 definition to the extent that it requires Responding Party to respond and/or produce document
 17 and/or information on behalf of any person or entity other than itself.

18 Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

19 **DEFINITION NO. 12:**

20 "Employee" means, without limitation, any current or former officer, director, executive,
 21 manager, secretary, messenger, agent, independent contractor or other person who is or was
 22 employed by a Defendant.

23 **OBJECTION TO DEFINITION NO. 12:**

24 Responding Party objects to this definition to the extent it attempts to impose obligations
 25 on Responding Party and/or seeks documents beyond those required to be produced pursuant to
 26 the Federal Rules of Civil Procedure.

27 Responding Party objects to this definition on the ground it calls for a legal conclusion.

28 Responding Party objects to this definition as vague, ambiguous, unintelligible, overly

1 broad to the extent it seeks documents and information that are not relevant to the subject matter
2 of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of
3 admissible evidence, and unduly burdensome to search for and produce.

4 Responding Party objects to this definition to the extent it seeks information and
5 documents that would disclose Responding Party's or a third party's respective trade secrets or
6 other confidential research, development, or confidential information protected by the Uniform
7 Trade Secrets Act, any and all rights of privacy under the United States Constitution or Article
8 One of the Constitution of the State of California, or any other applicable state constitution or
9 law, or which is otherwise prohibited from disclosure because to do so would cause Responding
10 Party to violate legal or contractual obligations to any other persons or entities. Where it may be
11 appropriate to do so and with adequate protections and limitations, Responding Party expressly
12 reserves the right to provide such information and/or documents only pursuant to the Protective
13 Order in this action.

14 Responding Party objects to this definition to the extent that it attempts or purports to call
15 for the production of any documents and/or information that are privileged, that were prepared in
16 anticipation of litigation or trial, that reveal communications between Responding Party and its
17 legal counsel, that otherwise constitute attorney work product, or that are otherwise privileged or
18 immune from discovery.

19 Responding Party objects to this definition to the extent it is intended to include persons
20 or entities other than Responding Party. To the extent and in the context a request uses the term
21 "Employee," Responding Party understands that the request and its obligations only extend to
22 documents and/or information within Responding Party's possession, custody or control.

23 Responding Party objects to this definition to the extent that it calls for documents and/or
24 information beyond Responding Party's knowledge. In addition, Responding Party objects to this
25 definition to the extent that it requires Responding Party to respond and/or produce document
26 and/or information on behalf of any person or entity other than itself.

27 Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

DEFINITION NO. 13:

“Relating to,” “referring to,” “regarding,” or “with respect to” mean without limitation discussing, describing, reflecting, dealing with, pertaining to, analyzing, evaluating, estimating, constituting, concerning, containing, mentioning, studying, surveying, projecting, assessing, recording, summarizing, criticizing, reporting, commenting or otherwise involving, in whole or in part.

OBJECTION TO DEFINITION NO. 13:

Responding Party objects to this definition to the extent it attempts to impose obligations on Responding Party and/or seeks documents, beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects to the expressions “relating to,” “referring to,” “regarding,” or “with respect to” to the extent they mean more than comprising, or on its face discusses, pertains to or is connected with a well-defined, unambiguous and identifiable topic or subject matter.

Responding Party objects to this definition because responding to such overly broad, vague and ambiguous requests would be unduly burdensome and oppressive.

DEFINITION NO. 14:

“Meeting” means, without limitation, any assembly, convocation, encounter, or contemporaneous presence of two or more persons for any purpose, whether planned or arranged, scheduled or not.

OBJECTION TO DEFINITION NO. 14:

No objection.

DEFINITION NO. 15:

“Communication” and “communications” are used in a comprehensive sense and shall mean and include every conceivable manner or means of disclosure, transfer or exchange of oral or written information (in the form of facts, ideas, inquiries or otherwise) between one or more persons or entities including, but not limited to, writings, documents, inter- and intra-office memoranda, correspondence, meetings, conferences, conversations, and/or agreements, whether face-to-face, by telephone, by mail, by telecopier, by telex, by computer or otherwise.

OBJECTION TO DEFINITION NO. 15:

Responding Party objects to this definition to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

DEFINITION NO. 16:

“Antitrust regulatory authority” means any governmental antitrust regulatory or investigative entity, whether domestic or foreign, including but not limited to the United States Department of Justice, European Commission, Japanese Fair Trade Commission, or Korea Fair Trade Commission.

OBJECTION TO DEFINITION NO. 16:

Responding Party objects to this definition to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

DEFINITION NO. 17:

“Studies” and/or “analyses” includes all reports, memoranda, statistical compilations, reviews, audits and other types of written, printed, or electronic submissions of information.

OBJECTION TO DEFINITION NO. 17:

Responding Party objects to this definition to the extent that it seeks to expand the scope of Rule 34 of the Federal Rules of Civil Procedure.

Responding Party also objects to this definition as overly broad to the extent it seeks documents and/or information that are not relevant to the subject matter of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence, and unduly burdensome to search for and produce.

DEFINITION NO. 18:

“Competitor” means any Defendant and all persons other than you that manufacture or sell CRTs and/or CRT Products.

OBJECTION TO DEFINITION NO. 18:

Responding Party objects to this definition to the extent it attempts to impose obligations

on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects to this definition on the ground the term “CRT Products” is vague, ambiguous, unintelligible, and overly broad to the extent it seeks documents and information that are not relevant to the subject matter of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence, and unduly burdensome to search for and produce. Moreover, any discovery as to “CRT Products” that is not reasonably related to Plaintiffs’ claims with respect to an alleged conspiracy involving CRTs is premature and overly burdensome until such time as Plaintiffs establish a reasonable basis for their claims regarding “CRT Products” to justify the enormous burden that Plaintiffs seek to impose on Responding Party by pursuing discovery as to all such products.

DEFINITION NO. 19:

“Selling,” “sold,” or “sale” means selling, swapping, trading, or otherwise transferring.

OBJECTION TO DEFINITION NO. 19:

No objection.

DEFINITION NO. 20:

“Price” means the price paid by a third party or the internal transfer price recorded or otherwise used in connection with a sale to a subsidiary, department, division, or affiliate.

OBJECTION TO DEFINITION NO. 20:

No objection.

DEFINITION NO. 21:

“CRTs” means cathode ray tubes. “CRT Products” means products containing CRTs, such as televisions and computer monitors.

OBJECTION TO DEFINITION NO. 21:

Responding Party objects to this definition to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects to this definition on the ground the term “CRT Products” is

vague, ambiguous, unintelligible, and overly broad to the extent it seeks documents and information that are not relevant to the subject matter of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence, and unduly burdensome to search for and produce. Moreover, any discovery as to “CRT Products” that is not reasonably related to Plaintiffs’ claims with respect to an alleged conspiracy involving CRTs is premature and overly burdensome until such time as Plaintiffs establish a reasonable basis for their claims regarding “CRT Products” to justify the enormous burden that Plaintiffs seek to impose on Responding Party by pursuing discovery as to all such products.

Responding Party objects to this definition on the ground that to the extent the Document Requests seek documents regarding “CRTs,” the Document Requests are overly broad and unduly burdensome, and purport to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence, as the Complaint purports to bring this class action “on behalf of individuals and entities that indirectly purchased Cathode Ray Tube Products (“CRT Products”),” not direct purchasers. Indirect Purchaser Plaintiffs’ Consolidated Amended Complaint (“Complaint”), ¶ 1. Furthermore, to the extent Responding Party produces documents responsive to the Document Requests regarding “CRTs” to Direct Purchaser Plaintiffs, such documents will not be produced again.

INSTRUCTIONS

INSTRUCTION NO. 1:

To the extent documents or ESI responsive to any of these Requests have already been produced to Plaintiffs, there is no need to produce those documents a second time. Instead, please provide the Bates numbers of any responsive documents already produced.

OBJECTION TO INSTRUCTION NO. 1:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

1 Responding Party objects to this instruction on the ground it is unduly burdensome and
2 oppressive.

3 **INSTRUCTION NO. 2:**

4 This document request calls for the production of all responsive documents and ESI in
5 your possession, custody or control without regard to the physical location of such documents.

6 **OBJECTION TO INSTRUCTION NO. 2:**

7 Responding Party objects to this instruction to the extent it attempts to impose obligations
8 on Responding Party and/or seeks documents beyond those required to be produced pursuant to
9 the Federal Rules of Civil Procedure.

10 Responding Party objects to this instruction on the ground it is unduly burdensome and
11 oppressive.

12 **INSTRUCTION NO. 3:**

13 In producing documents, ESI and other materials, you must furnish all documents, ESI or
14 things in your possession, custody or control, regardless of whether such documents, ESI or
15 materials are possessed directly by you or your directors, officers, agents, employees,
16 representatives, subsidiaries, managing agents, affiliates, investigators, or by your attorneys or
17 their agents, employees, representatives or investigators.

18 **OBJECTION TO INSTRUCTION NO. 3:**

19 Responding Party objects to this instruction to the extent it attempts to impose obligations
20 on Responding Party and/or seeks documents beyond those required to be produced pursuant to
21 the Federal Rules of Civil Procedure.

22 Responding Party objects to this instruction on the ground it calls for a legal conclusion.

23 Responding Party objects to this instruction as vague, ambiguous, unintelligible, overly
24 broad to the extent it seeks documents and information that are not relevant to the subject matter
25 of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of
26 admissible evidence, and unduly burdensome to search for and produce.

27 Responding Party objects to this instruction to the extent it seeks documents and
28 information that would disclose Responding Party's or a third party's respective trade secrets or

1 other confidential research, development, or confidential information protected by the Uniform
 2 Trade Secrets Act, any and all rights of privacy under the United States Constitution or Article
 3 One of the Constitution of the State of California, or any other applicable state constitution or
 4 law, or which is otherwise prohibited from disclosure because to do so would cause Responding
 5 Party to violate legal or contractual obligations to any other persons or entities. Where it may be
 6 appropriate to do so and with adequate protections and limitations, Responding Party expressly
 7 reserves the right to provide such information and/or documents only pursuant to the Protective
 8 Order in this action.

9 Responding Party objects to this instruction to the extent that it attempts or purports to call
 10 for the production of any documents and/or information that are privileged, that were prepared in
 11 anticipation of litigation or trial, that reveal communications between Responding Party and its
 12 legal counsel, that otherwise constitute attorney work product, are subject to the joint defense or
 13 common interest privilege, or that are otherwise privileged or immune from discovery.

14 Responding Party objects to this instruction to the extent it is intended to include persons
 15 or entities other than Responding Party. To the extent and in the context a request uses the term
 16 “you or your directors, officers, agents, employees, representatives, subsidiaries, managing
 17 agents, affiliates, investigators, or by your attorneys or their agents, employees, representatives or
 18 investigators,” Responding Party understands that the request and its obligations only extend to
 19 documents and/or information within Responding Party’s possession, custody or control.

20 Responding Party objects to this instruction to the extent that it calls for documents and/or
 21 information beyond Responding Party’s knowledge. In addition, Responding Party objects to this
 22 instruction to the extent that it requires Responding Party to respond and/or produce documents
 23 and/or information on behalf of any person or entity other than itself.

24 Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

25 **INSTRUCTION NO. 4:**

26 In producing documents and ESI, you must produce the original of each document
 27 requested together with all non-identical copies and drafts of that document. If the original of any
 28 document cannot be located, a copy shall be provided in lieu thereof, and shall be legible and

bound or stapled in the same manner as the original (to the extent this is known).

OBJECTION TO INSTRUCTION NO. 4:

Responding Party objects to this instruction to the extent that it seeks to expand the scope of Rule 34 of the Federal Rules of Civil Procedure.

Responding Party also objects to this instruction as overly broad to the extent it seeks documents and/or information that are not relevant to the subject matter of this action, not admissible in evidence, not reasonably calculated to lead to the discovery of admissible evidence, and unduly burdensome to search for and produce.

INSTRUCTION NO. 5:

Pursuant to Federal Rule of Civil Procedure 34(b), documents shall be produced as they are kept in the usual course of business and shall be organized and labeled to identify any file number, file name, or any other file identification system utilized by the responding party, as well as the location and custodian of such records. These Requests include Plaintiffs' request to physically inspect any file drawer, filing cabinet or any other storage device where documents responsive to these requests are maintained at the time of the inspection of such documents.

OBJECTION TO INSTRUCTION NO. 5:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

INSTRUCTION NO. 6:

Documents attached to each other should not be separated. If any portion of any document is responsive to any portion of the document requests below, then the entire document must be produced.

OBJECTION TO INSTRUCTION NO. 6:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

INSTRUCTION NO. 7:

All documents produced should be numbered sequentially, with a unique number on each page, and with a prefix identifying the party producing the document.

OBJECTION TO INSTRUCTION NO. 7:

No objection.

INSTRUCTION NO. 8:

Documents shall be produced in such fashion as to identify the department, branch or office in whose possession they were located and, where applicable, the natural person in whose possession they were found (i.e., the document custodian) and the business address of each document custodian.

OBJECTION TO INSTRUCTION NO. 8:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects to this instruction on the ground it is unduly burdensome and oppressive.

INSTRUCTION NO. 9:

Pursuant to Federal Rule of Civil Procedure 34(b)(1)(C), the responding party must produce any ESI in its native format. If ESI in its native format can only be accessed by proprietary or legacy software, the responding party shall receive all information and software necessary to access the ESI.

OBJECTION TO INSTRUCTION NO. 9:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects to this instruction to the extent it seeks documents and information that would disclose Responding Party's or a third party's respective trade secrets or other confidential research, development, or confidential information protected by the Uniform

Trade Secrets Act, any and all rights of privacy under the United States Constitution or Article One of the Constitution of the State of California, or any other applicable state constitution or law, including any copyright or license, or which is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal or contractual obligations to any other persons or entities. Where it may be appropriate to do so and with adequate protections and limitations, Responding Party expressly reserves the right to provide such information and/or documents only pursuant to the Protective Order in this action.

INSTRUCTION NO. 10:

If any responsive document was, but no longer is, in the possession of or subject to your control, state whether it (i) is missing or lost, (ii) has been destroyed, (iii) has been transferred, voluntarily or involuntarily, to others, or (iv) has been otherwise disposed of.

OBJECTION TO INSTRUCTION NO. 10:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects on the grounds that it is impossible to identify, describe, and further explain the circumstances regarding every document that ever “was, but no longer is, in the possession of or subject to your control.” To the extent that it is even possible to identify, describe, and explain the circumstances regarding such documents, this investigation would impose a unique, time-consuming and unreasonable burden.

Responding Party objects to this instruction on the ground it is unduly burdensome and oppressive.

INSTRUCTION NO. 11:

In each instance in which a document once existed and subsequently is lost, missing, destroyed or otherwise disposed of, explain the circumstances surrounding the disposition of the document, including but not limited to:

- a. the identity of the person or entity who last possessed the document;
- b. the date or approximate date of such disposition; and

c. the identity of all persons who have or had knowledge of the document's contents.

OBJECTION TO INSTRUCTION NO. 11:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

Responding Party objects on the grounds that it is impossible to identify, describe, and further explain the circumstances regarding every document that ever "once existed and subsequently is lost, missing, destroyed or otherwise disposed of." To the extent that it is even possible to identify, describe, and explain the circumstances regarding such documents, this investigation would impose a unique, time-consuming and unreasonable burden.

Responding Party objects to this instruction on the ground it is unduly burdensome and oppressive.

INSTRUCTION NO. 12:

12. In the event that you object to any document request on the ground of privilege or work product, a statement shall be provided as to each document which includes:

- a. the name of the author of the document;
- b. the name of the recipient of the document;
- c. the names of the persons to whom copies were sent;
- d. the job title of every individual named in (a), (b), and (c) above;
- e. the date the document was created, sent, and received;
- f. the location of the document;
- g. the custodian of the document;
- h. a brief description of the nature and subject matter of the document; and
- i. a statement of the privilege asserted and each and every fact or basis upon which a privilege is claimed or on which the document is otherwise withheld.

Notwithstanding the assertion of any objection to production, if a document contains non-objectionable or non-privileged matter, please produce that document, redacting that portion for which the objection is asserted, provided that the identification requested in paragraphs (h) and (i)

above are furnished. A log itemizing each of these documents and this corresponding information that forms the basis for your objection on privilege or work product grounds shall be served contemporaneously with your responses to these document requests.

OBJECTION TO INSTRUCTION NO. 12:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure or the Federal Rules of Evidence.

INSTRUCTION NO. 13:

Each document should be produced in its entirety and without deletion, redaction or excisions, except as provided by Instruction 12 above, regardless of whether you consider the entire document or only part of it to be relevant or responsive to these document requests. If you have redacted any portion of a document, stamp the word "REDACTED" beside the redacted information on each page of the document which you have redacted. Any redactions to such documents produced should be identified in accordance with Instruction 12 above.

OBJECTION TO INSTRUCTION NO. 13:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to the Federal Rules of Civil Procedure.

INSTRUCTION NO. 14:

In responding to these requests you are to include documents: (a) obtained from witnesses who gave information to any antitrust regulatory authority or investigatory body; (b) that constitute, or refer or relate to, summaries of testimony or other statements in connection with any antitrust regulatory authority or investigatory body proceedings or investigations; or (c) obtained on your behalf by counsel in preparing for testimony or interviews before any antitrust regulatory authority or investigatory body.

OBJECTION TO INSTRUCTION NO. 14:

Responding Party objects to this instruction to the extent it attempts to impose obligations on Responding Party and/or seeks documents beyond those required to be produced pursuant to

1 the Federal Rules of Civil Procedure.

2 Responding Party objects to this instruction to the extent it attempts to impose obligations
3 on Responding Party exceeding the scope of the Stay Order in this case.

4 **INSTRUCTION NO. 15:**

5 The following requests are continuing in nature pursuant to Rule 26(e) of the Federal
6 Rules of Civil Procedure so as to require the prompt production of supplemental or additional
7 responsive documents when you become aware of such, up to and including the time of trial.

8 **OBJECTION TO INSTRUCTION NO. 15:**

9 Responding Party objects to this instruction to the extent it attempts to impose obligations
10 on Responding Party and/or seeks documents beyond those required to be produced pursuant to
11 the Federal Rules of Civil Procedure.

12
13 **DEFINITION OF RELEVANT TIME PERIOD**

14 Unless otherwise stated, these Requests call for the production of all documents that were
15 generated and/or maintained during the period January 1, 1995 through the present (the “Relevant
16 Time Period”). These document requests seek all responsive documents created or generated
17 during the Relevant Time Period, as well as responsive documents created or generated outside
18 the Relevant Time Period, but which contain information concerning the Relevant Time Period.

19
20 **OBJECTION TO DEFINITION OF RELEVANT TIME PERIOD**

21 Responding Party objects to the definition of the Relevant Time Period on the grounds
22 that it is vague, ambiguous, unintelligible, over broad and seeks information or materials on
23 matters not relevant to the subject matter of this action, not admissible in evidence, and not
24 reasonably calculated to lead to the discovery of admissible evidence.

25 The “Relevant Time Period” as defined exceeds the putative class period, which begins on
26 March 1, 1995 and ends on November 25, 2007 (Complaint, ¶ 1), and seeks documents and
27 information beyond the statute of limitations period. Judge Conti has directed the parties to Judge

1 Legge to develop procedures for the early resolution of statute of limitations issues and to reduce
 2 the burden in connection therewith. Responding Party believes it is premature for it to have to
 3 produce any documents from prior to the statute of limitations period until Judge Legge considers
 4 this issue and determines the proper scope of that burden.

5 For purposes of responding to these Document Requests, Responding Party will interpret
 6 “Relevant Time Period” to mean the applicable statute(s) of limitations period(s) (the
 7 “Limitations Period”).

8 Each of the foregoing General Objections and Objections to Definitions and Instructions
 9 is incorporated into the following specific objections. Accordingly, each specific objection is
 10 made subject to, and without waiver of, the foregoing General Objections and Objections to
 11 Definitions and Instructions. Responding Party incorporates by reference each and every General
 12 Objection and Objection to Definitions and Instructions into each and every specific response.
 13 From time to time a specific response may repeat a General Objection or Objection to the
 14 Definitions and Instructions for emphasis or some other reason. The failure to repeat any General
 15 Objection or Objection to the Definitions and Instructions in any specific response shall not be
 16 interpreted as a waiver of any General Objection or Objection to the Definitions and Instructions
 17 to that response.

18 **SPECIFIC RESPONSES TO DOCUMENT REQUESTS**

19 **REQUEST NO. 1:**

20 Documents sufficient to show your corporate structure or organization throughout the
 21 relevant time period, including, but not limited to, departments, divisions, parents, subsidiaries,
 22 joint ventures, affiliates, or other sub-units that were engaged during any part of the relevant time
 23 period in the manufacture, marketing, pricing, sale or distribution of CRTs or CRT Products
 24 including, where applicable, the percentage of any stock or other interests owned by each entity in
 25 the chain.
 26
 27

RESPONSE TO REQUEST NO. 1:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period is November 25, 2007.

Responding Party objects to this request on the grounds that, to the extent it seeks

documents not related to “CRT Products” only, this request is overly broad and unduly burdensome and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to the extent this request seeks documents that are no longer active or readily accessible in electronic form which renders this request overly broad and unduly burdensome.

Responding Party objects on the grounds that, to the extent this request seeks documents related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

Responding Party objects on the grounds that, to the extent Responding Party produces documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be produced again.

Responding Party objects that to the extent documents responsive to this request have previously been produced, they will not be produced again.

Subject to and without waiving the general and specific objections stated above, Responding Party responds that it will make reasonable, not unduly burdensome efforts to identify documents responsive to this request within the Limitations Period and, if any, will produce non-privileged, responsive documents.

REQUEST NO. 2:

As to each of your divisions, subdivisions, departments, units, subsidiaries, parents, affiliates and joint ventures, documents sufficient to identify each employee having any responsibilities or duties with respect to each of the following:

- a. the manufacturing or production of CRTs or CRT Products;
- b. the marketing of CRTs or CRT Products;

- c. the pricing of CRTs or CRT Products;
- d. the sale or distribution of CRTs or CRT Products;
- e. maintaining any electronic database(s), including archives of e-mails or other electronic documents relating to CRTs or CRT Products.

RESPONSE TO REQUEST NO. 2:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad

1 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
2 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
3 of the alleged class period is November 25, 2007.

4 Responding Party objects to this request on the grounds that, to the extent it seeks
5 documents not related to “CRT Products” only, this request is overly broad and unduly
6 burdensome and purports to call for information that is not relevant to the claim or defense of any
7 party, not relevant to the subject matter involved in this action, and not reasonably calculated to
8 lead to the discovery of admissible evidence.

9 Responding Party objects to the extent this request seeks documents that are no longer
10 active or readily accessible in electronic form which renders this request overly broad and unduly
11 burdensome.

12 Responding Party objects on the grounds that, to the extent this request seeks documents
13 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
14 information that is not relevant to the claim or defense of any party, not relevant to the subject
15 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
16 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
17 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

18 Responding Party objects on the grounds that, to the extent Responding Party produces
19 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
20 produced again.

21 Responding Party objects that to the extent documents responsive to this request have
22 previously been produced, they will not be produced again.

23 Subject to and without waiving the general and specific objections stated above,
24 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
25 identify documents responsive to this request within the Limitations Period and, if any, will
26 produce non-privileged, responsive documents.

27 **REQUEST NO. 3:**

28 Documents sufficient to describe your policies or practices with respect to the retention or

1 destruction of documents during the period January 1, 1991 through the present, and, if such
 2 policy or practice has been different with respect to any category of documents or over different
 3 times, documents sufficient to identify each such category or time period and to describe your
 4 retention policy or practice with respect to each such category or time period.

5 **RESPONSE TO REQUEST NO. 3:**

6 Responding Party reasserts and incorporates each of the General Objections and
 7 Objections to Definitions and Instructions set forth above.

8 Responding Party objects to this request on the grounds that it is overly broad, unduly
 9 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

10 Responding Party objects to this request on the grounds it seeks information and/or
 11 documents that would disclose confidential information protected by any and all rights of privacy
 12 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 13 from disclosure because to do so would cause Responding Party to violate legal and/or
 14 contractual obligations to any other persons or entities.

15 Responding Party objects to this request on the grounds that it seeks production of
 16 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 17 common interest privilege, or by any other applicable doctrine or privilege.

18 Responding Party objects on the grounds that the “Relevant Time Period” and the time
 19 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
 20 request not reasonably calculated to lead to the discovery of admissible evidence as the
 21 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
 22 is November 25, 2007.

23 Responding Party objects to this request on the grounds that, to the extent it seeks
 24 documents not related to the allegations in the Complaint, the request is overly broad and unduly
 25 burdensome, and purports to call for information that is not relevant to the claim or defense of
 26 any party, not relevant to the subject matter involved in this action, and not reasonably calculated
 27 to lead to the discovery of admissible evidence.

28 Responding Party objects on the grounds that, to the extent Responding Party produces

documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be produced again.

Responding Party objects that to the extent documents responsive to this request have previously been produced, they will not be produced again.

Subject to and without waiving the objections stated above, Responding Party will produce those non-privileged, responsive documents within the Limitations Period within its possession, custody or control, to the extent any such documents exist.

REQUEST NO. 4:

Documents sufficient to show the manner in which you have maintained records relating to CRTs or CRT Products during the period January 1, 1991 through the present, including documents sufficient to describe all electronic data processing systems, programs, and outputs used to record, store, compute, analyze or retrieve electronically stored information relating to your pricing, production, distribution, marketing or sale of CRTs or CRT Products in and into the United States.

RESPONSE TO REQUEST NO. 4:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks

1 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
2 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
3 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
4 action, and not reasonably calculated to lead to the discovery of admissible evidence.

5 Responding Party objects on the grounds that the “Relevant Time Period” and the time
6 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
7 request not reasonably calculated to lead to the discovery of admissible evidence as the
8 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
9 is November 25, 2007.

10 Responding Party objects on the grounds that, to the extent this request seeks documents
11 not related to the allegations in the Complaint, this request is overly broad and unduly
12 burdensome, and purports to call for information that is not relevant to the claim or defense of
13 any party, not relevant to the subject matter involved in this action, and not reasonably calculated
14 to lead to the discovery of admissible evidence.

15 Responding Party objects that the phrase “manner in which you have maintained records”
16 is vague, ambiguous, and unintelligible, rendering the request overly broad and unduly
17 burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Responding Party objects on the grounds that, to the extent this request seeks documents
20 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
21 information that is not relevant to the claim or defense of any party, not relevant to the subject
22 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
23 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
24 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

25 Responding Party objects on the grounds that, to the extent Responding Party produces
26 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
27 produced again.

28 Responding Party objects that to the extent documents responsive to this request have

1 previously been produced, they will not be produced again.

2 Subject to and without waiving the objections stated above, Responding Party will
3 produce those non-privileged, responsive documents within the Limitations Period within its
4 possession, custody or control, to the extent any such documents exist.

5 **REQUEST NO. 5:**

6 All documents and electronic data relating to your sales of CRTs or CRT Products during
7 the period January 1, 1991 through the present, including, but not limited to:

- 8 a. customer names, customer billing addresses, and customer ship-to addresses;
- 9 b. sales terms;
- 10 c. sales dates and shipment dates;
- 11 d. product type, class, category, description and respective use;
- 12 e. sales volumes;
- 13 f. unit price information, gross price, and actual net prices;
- 14 g. discounts, credits and rebates;
- 15 h. shipping charges and terms;
- 16 i. any other related charges; and
- 17 j. amounts paid, dates paid, invoice numbers, and purchase order numbers. If such
18 data are not kept, or have not been kept, in electronic form in the ordinary course of your business
19 or are otherwise not available in electronic form, please produce such data in hard copy.

20 **RESPONSE TO REQUEST NO. 5:**

21 Responding Party reasserts and incorporates each of the General Objections and
22 Objections to Definitions and Instructions set forth above.

23 Responding Party objects to this request on the grounds that it is overly broad, unduly
24 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
25 including to the extent that it seeks the discovery of documents regarding Responding Party's
26 sales outside of the United States and unrelated to United States commerce, as such sales are
27 beyond the scope of this litigation and thereby render the Document Requests overly broad,
28 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

1 evidence.

2 Responding Party objects to this request on the grounds that it seeks production of
3 documents protected by the attorney-client privilege, work product doctrine, joint defense or
4 common interest privilege, or by any other applicable doctrine or privilege.

5 Responding Party objects to this request on the grounds it seeks information and/or
6 documents that would disclose confidential information protected by any and all rights of privacy
7 under the United States Constitution or any other applicable law, or that is otherwise prohibited
8 from disclosure because to do so would cause Responding Party to violate legal and/or
9 contractual obligations to any other persons or entities.

10 Responding Party objects to this request on the grounds that, to the extent it seeks
11 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
12 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
13 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
14 action, and not reasonably calculated to lead to the discovery of admissible evidence.

15 Responding Party objects on the grounds that “the “Relevant Time Period” and the time
16 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
17 request not reasonably calculated to lead to the discovery of admissible evidence as the
18 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
19 is November 25, 2007.

20 Responding Party objects on the grounds that it seeks documents not in existence or not
21 currently in its possession, custody or control.

22 Responding Party objects to the extent this request seeks documents that are no longer
23 active or readily accessible in electronic form which renders this request overly broad and unduly
24 burdensome.

25 Responding Party objects that the phrases “respective use” and “related charges” are
26 vague, ambiguous and unintelligible, rendering this request overly broad and unduly burdensome,
27 not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

28 Responding Party objects on the grounds that, to the extent this request seeks documents

1 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 2 information that is not relevant to the claim or defense of any party, not relevant to the subject
 3 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 4 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 5 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

6 Responding Party objects on the grounds that, to the extent Responding Party produces
 7 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
 8 produced again.

9 Responding Party objects that to the extent documents responsive to this request have
 10 previously been produced, they will not be produced again.

11 Subject to and without waiving the general and specific objections stated above,
 12 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 13 identify documents responsive to this request within the Limitations Period and, if any, will
 14 produce non-privileged, responsive documents.

15 **REQUEST NO. 6:**

16 All software instructions, programs, manuals, or other documents necessary to operate,
 17 run or understand any of the programs maintained on the computer-related equipment or system
 18 utilized by you to maintain, gain access to or read data produced in response to Requests Nos. 4-
 19 5, including all record layouts, field codes or other descriptions.

20 **RESPONSE TO REQUEST NO. 6:**

21 Responding Party reasserts and incorporates each of the General Objections and
 22 Objections to Definitions and Instructions set forth above.

23 Responding Party objects to this request on the grounds that it is overly broad, unduly
 24 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 25 including to the extent that it seeks the discovery of documents regarding Responding Party’s
 26 sales outside of the United States and unrelated to United States commerce, as such sales are
 27 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 28 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

1 evidence.

2 Responding Party objects to this request on the grounds that it seeks production of
3 documents protected by the attorney-client privilege, work product doctrine, joint defense or
4 common interest privilege, or by any other applicable doctrine or privilege.

5 Responding Party objects to this request on the grounds it seeks information and/or
6 documents that would disclose confidential information protected by any and all rights of privacy
7 under the United States Constitution or any other applicable law, including copyright and
8 licensing agreements, or that is otherwise prohibited from disclosure because to do so would
9 cause Responding Party to violate legal and/or contractual obligations to any other persons or
10 entities.

11 Responding Party objects to this request on the grounds that, to the extent it seeks
12 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
13 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
14 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
15 action, and not reasonably calculated to lead to the discovery of admissible evidence.

16 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
17 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
18 admissible evidence as the Complaint does not allege a continuing conspiracy, the outer limit of
19 the alleged class period is November 25, 2007, and claims prior to November 13, 2003, are barred
20 by the statute of limitations.

21 Responding Party objects to the extent this request seeks documents that are no longer
22 active or readily accessible in electronic form which renders this request overly broad and unduly
23 burdensome.

24 Responding Party objects on the grounds that, to the extent this request seeks documents
25 not related to the allegations in the Complaint, this request is overly broad and unduly
26 burdensome, and purports to call for information that is not relevant to the claim or defense of
27 any party, not relevant to the subject matter involved in this action, and not reasonably calculated
28 to lead to the discovery of admissible evidence.

1 Responding Party objects on the grounds that it seeks documents not in existence or not
2 currently in its possession, custody or control.

3 Subject to and without waiving the general and specific objections stated above,
4 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
5 identify documents responsive to this request within the Limitations Period and, if any, will
6 produce non-privileged, responsive documents.

7 **REQUEST NO. 7:**

8 All documents relating to polices, methods, formulas or factors to be used in determining,
9 computing or quoting prices, including rebates or discounts, in connection with the sale of CRTs
10 or CRT Products.

11 **RESPONSE TO REQUEST NO. 7:**

12 Responding Party reasserts and incorporates each of the General Objections and
13 Objections to Definitions and Instructions set forth above.

14 Responding Party objects to this request on the grounds that it is overly broad, unduly
15 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
16 including to the extent that it seeks the discovery of documents regarding Responding Party's
17 sales outside of the United States and unrelated to United States commerce, as such sales are
18 beyond the scope of this litigation and thereby render the Document Requests overly broad,
19 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this request on the grounds that it seeks production of
22 documents protected by the attorney-client privilege, work product doctrine, joint defense or
23 common interest privilege, or by any other applicable doctrine or privilege.

24 Responding Party objects to this request on the grounds it seeks information and/or
25 documents that would disclose confidential information protected by any and all rights of privacy
26 under the United States Constitution or any other applicable law, or that is otherwise prohibited
27 from disclosure because to do so would cause Responding Party to violate legal and/or
28 contractual obligations to any other persons or entities.

1 Responding Party objects to this request on the grounds that, to the extent it seeks
2 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
3 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
4 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
5 action, and not reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
7 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
8 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
9 of the alleged class period is November 25, 2007.

10 Responding Party objects to the extent this request seeks documents that are no longer
11 active or readily accessible in electronic form which renders this request overly broad and unduly
12 burdensome.

13 Responding Party objects to the extent this request seeks documents or information that is
14 not within the possession, custody, or control of Responding Party.

15 Responding Party objects that the phrases “methods, formulas or factors” and
16 “determining, computing or quoting prices” are vague, ambiguous and unintelligible, rendering
17 the request overly broad and unduly burdensome, not relevant and not reasonably calculated to
18 lead to the discovery of admissible evidence.

19 Responding Party objects to this request to the extent it seeks documents or information
20 that will be the subject of expert discovery, as expert discovery has not commenced in this matter.

21 Responding Party objects on the grounds that, to the extent this request seeks documents
22 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
23 information that is not relevant to the claim or defense of any party, not relevant to the subject
24 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
25 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
26 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

27 Responding Party objects on the grounds that, to the extent Responding Party produces
28 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be

1 produced again.

2 Responding Party objects that to the extent documents responsive to this request have
3 previously been produced, they will not be produced again.

4 Subject to and without waiving the general and specific objections stated above,
5 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
6 identify documents responsive to this request within the Limitations Period and, if any, will
7 produce non-privileged, responsive documents.

8 **REQUEST NO. 8:**

9 All documents relating to any published prices for CRTs or CRT Products during the
10 period January 1, 1991 through the present, including price announcements, price lists, price
11 schedules, price changes, or justifications or explanations of price changes communicated to
12 customers in the United States.

13 **RESPONSE TO REQUEST NO. 8:**

14 Responding Party reasserts and incorporates each of the General Objections and
15 Objections to Definitions and Instructions set forth above.

16 Responding Party objects to this request on the grounds that it is overly broad, unduly
17 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
18 including to the extent that it seeks the discovery of documents regarding Responding Party's
19 sales outside of the United States and unrelated to United States commerce, as such sales are
20 beyond the scope of this litigation and thereby render the Document Requests overly broad,
21 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request on the grounds that it seeks production of
24 documents protected by the attorney-client privilege, work product doctrine, joint defense or
25 common interest privilege, or by any other applicable doctrine or privilege.

26 Responding Party objects to this request on the grounds it seeks information and/or
27 documents that would disclose confidential information protected by any and all rights of privacy
28 under the United States Constitution or any other applicable law, or that is otherwise prohibited

1 from disclosure because to do so would cause Responding Party to violate legal and/or
2 contractual obligations to any other persons or entities.

3 Responding Party objects to this request on the grounds that, to the extent it seeks
4 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
5 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
6 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
7 action, and not reasonably calculated to lead to the discovery of admissible evidence.

8 Responding Party objects on the grounds that the “Relevant Time Period” and “the period
9 January 1, 1991 through the present” is overly broad and not relevant, rendering the request not
10 reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not
11 allege a continuing conspiracy and the outer limit of the alleged class period is November 25,
12 2007.

13 Responding Party objects to the extent this request seeks documents that are no longer
14 active or readily accessible in electronic form which renders this request overly broad and unduly
15 burdensome.

16 Responding Party objects to the extent this request seeks documents or information that is
17 not within the possession, custody, or control of Responding Party.

18 Responding Party objects that the phrases “published prices” and “customers” are vague,
19 ambiguous, and unintelligible, rendering the request overly broad and unduly burdensome, not
20 relevant and not reasonably calculated to lead to the discovery of admissible evidence.

21 Responding Party objects that the term “customers in the United States” calls for a legal
22 conclusion.

23 Responding Party objects to the extent this request seeks documents or information that
24 require discovery of information and materials from third-parties or sources that are equally if not
25 more accessible to Plaintiffs.

26 Responding Party objects to the extent this request seeks documents or information that
27 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

28 Responding Party objects on the grounds that, to the extent this request seeks documents

1 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 2 information that is not relevant to the claim or defense of any party, not relevant to the subject
 3 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 4 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 5 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

6 Responding Party objects on the grounds that, to the extent Responding Party produces
 7 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
 8 produced again.

9 Responding Party objects that to the extent documents responsive to this request have
 10 previously been produced, they will not be produced again.

11 Subject to and without waiving the general and specific objections stated above,
 12 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 13 identify documents responsive to this request within the Limitations Period and, if any, will
 14 produce non-privileged, responsive documents.

15 **REQUEST NO. 9:**

16 All documents relating to contracts, offers or proposals for CRTs or CRT Products sales
 17 during the period January 1, 1991 through the present.

18 **RESPONSE TO REQUEST NO. 9:**

19 Responding Party reasserts and incorporates each of the General Objections and
 20 Objections to Definitions and Instructions set forth above.

21 Responding Party objects to this request on the grounds that it is overly broad, unduly
 22 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 23 including to the extent that it seeks the discovery of documents regarding Responding Party’s
 24 sales outside of the United States and unrelated to United States commerce, as such sales are
 25 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 26 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 27 evidence.

28 Responding Party objects to this request on the grounds that it seeks production of

1 documents protected by the attorney-client privilege, work product doctrine, joint defense or
2 common interest privilege, or by any other applicable doctrine or privilege.

3 Responding Party objects to this request on the grounds it seeks information and/or
4 documents that would disclose confidential information protected by any and all rights of privacy
5 under the United States Constitution or any other applicable law, or that is otherwise prohibited
6 from disclosure because to do so would cause Responding Party to violate legal and/or
7 contractual obligations to any other persons or entities.

8 Responding Party objects to this request on the grounds that, to the extent it seeks
9 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
10 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
11 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
12 action, and not reasonably calculated to lead to the discovery of admissible evidence.

13 Responding Party objects on the grounds that the “Relevant Time Period” and the time
14 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
15 request not reasonably calculated to lead to the discovery of admissible evidence as the
16 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
17 is November 25, 2007.

18 Responding Party objects to the extent this request seeks documents that are no longer
19 active or readily accessible in electronic form which renders this request overly broad and unduly
20 burdensome.

21 Responding Party objects to the extent this request seeks documents or information that is
22 not within the possession, custody, or control of Responding Party.

23 Responding Party objects that the phrase “contracts, offers or proposals” is vague,
24 ambiguous and unintelligible, rendering this request overly broad and unduly burdensome, not
25 relevant and not reasonably calculated to lead to the discovery of admissible evidence.

26 Responding Party objects to the extent this request seeks documents or information that
27 require discovery of information and materials from third-parties or sources that are equally if not
28 more accessible to Plaintiffs.

1 Responding Party objects to the extent this request seeks documents or information that
2 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

3 Responding Party objects on the grounds that, to the extent this request seeks documents
4 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
5 information that is not relevant to the claim or defense of any party, not relevant to the subject
6 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
7 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
8 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

9 Responding Party objects on the grounds that, to the extent Responding Party produces
10 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
11 produced again.

12 Responding Party objects that to the extent documents responsive to this request have
13 previously been produced, they will not be produced again.

14 Subject to and without waiving the general and specific objections stated above,
15 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
16 identify documents responsive to this request within the Limitations Period and, if any, will
17 produce non-privileged, responsive documents.

18 **REQUEST NO. 10:**

19 Documents sufficient to identify each of your facilities that produced CRTs or CRT
20 Products from January 1, 1991 through the present and for each such facility, all documents
21 relating to:

22 a. capacity, rated capacity, production and capacity utilization during each year of the
23 relevant time period;

24 b. any proposed or actual change in the capacity to produce CRTs or CRT Products;

25 c. any reason for changes in each facility’s actual production of CRTs or CRT
26 Products;

27 d. the identity of all persons who had decision-making or supervisory responsibility
28 regarding production of CRTs or CRT Products;

e. each type, class, category and respective use of CRTs or CRT Products produced and the amounts of each produced during each month of the relevant time period;

f. any production shutdowns or slowdowns of CRTs or CRT Products production and reasons for such shutdowns or slowdowns;

g. any projected production forecasts; and

h. any future plans to construct, joint venture or purchase fabrication plants used to manufacture or produce CRTs or CRT Products.

RESPONSE TO REQUEST NO. 10:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not

1 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
2 action, and not reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects on the grounds that the “Relevant Time Period” and the time
4 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
5 request not reasonably calculated to lead to the discovery of admissible evidence as the
6 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
7 is November 25, 2007.

8 Responding Party objects to the extent this request seeks documents that are no longer
9 active or readily accessible in electronic form which renders this request overly broad and unduly
10 burdensome.

11 Responding Party objects to the extent this request seeks documents or information that is
12 not within the possession, custody, or control of Responding Party.

13 Responding Party objects that the definition of the term “your” is vague, ambiguous, and
14 unintelligible, rendering the request overly broad and unduly burdensome, not relevant, and not
15 reasonably calculated to lead to the discovery of admissible evidence.

16 Responding Party objects that the terms “capacity,” “decision-making or supervisory
17 responsibility,” and “respective use” are vague, ambiguous and unintelligible, rendering the
18 request overly broad and unduly burdensome, not relevant and not reasonably calculated to lead
19 to the discovery of admissible evidence.

20 Responding Party objects to the extent this Request is duplicative of Request No. 2 of the
21 Document Requests.

22 Responding Party objects on the grounds that, to the extent this request seeks documents
23 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
24 information that is not relevant to the claim or defense of any party, not relevant to the subject
25 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
26 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
27 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

28 Responding Party objects on the grounds that, to the extent Responding Party produces

documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be produced again.

Responding Party objects that to the extent documents responsive to this request have previously been produced, they will not be produced again.

Subject to and without waiving the general and specific objections stated above, Responding Party responds that it will make reasonable, not unduly burdensome efforts to identify documents responsive to this request within the Limitations Period and, if any, will produce non-privileged, responsive documents.

REQUEST NO. 11:

Documents sufficient to describe the processes for producing CRTs or CRT Products, including but not limited to, any industry standards.

RESPONSE TO REQUEST NO. 11:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or

1 contractual obligations to any other persons or entities.

2 Responding Party objects to this request on the grounds that, to the extent it seeks
3 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
4 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
5 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
6 action, and not reasonably calculated to lead to the discovery of admissible evidence.

7 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
8 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
9 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
10 of the alleged class period is November 25, 2007.

11 Responding Party objects to the extent this request seeks documents that are no longer
12 active or readily accessible in electronic form which renders this request overly broad and unduly
13 burdensome.

14 Responding Party objects to the extent this request seeks documents or information that is
15 not within the possession, custody, or control of Responding Party.

16 Responding Party objects that the phrases “processes for producing” and “industry
17 standards” are vague, ambiguous, and unintelligible, rendering the request overly broad and
18 unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of
19 admissible evidence.

20 Responding Party objects to the extent this request seeks documents or information that
21 require discovery of information and materials from third-parties or sources that are equally if not
22 more accessible to Plaintiffs.

23 Responding Party objects to the extent this request seeks documents or information that
24 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

25 Responding Party objects on the grounds that, to the extent this request seeks documents
26 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
27 information that is not relevant to the claim or defense of any party, not relevant to the subject
28 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible

1 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
2 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

3 Responding Party objects on the grounds that, to the extent Responding Party produces
4 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
5 produced again.

6 Responding Party objects that to the extent documents responsive to this request have
7 previously been produced, they will not be produced again.

8 Subject to and without waiving the general and specific objections stated above,
9 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
10 identify documents responsive to this request within the Limitations Period and, if any, will
11 produce non-privileged, responsive documents.

12 **REQUEST NO. 12:**

13 All documents relating to the cost of manufacturing, marketing, selling, and distributing
14 CRTs or CRT Products during the period January 1, 1991 through the present.

15 **RESPONSE TO REQUEST NO. 12:**

16 Responding Party reasserts and incorporates each of the General Objections and
17 Objections to Definitions and Instructions set forth above.

18 Responding Party objects to this request on the grounds that it is overly broad, unduly
19 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
20 including to the extent that it seeks the discovery of documents regarding Responding Party’s
21 sales outside of the United States and unrelated to United States commerce, as such sales are
22 beyond the scope of this litigation and thereby render the Document Requests overly broad,
23 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Responding Party objects to this request on the grounds that it seeks production of
26 documents protected by the attorney-client privilege, work product doctrine, joint defense or
27 common interest privilege, or by any other applicable doctrine or privilege.

28 Responding Party objects to this request on the grounds it seeks information and/or

1 documents that would disclose confidential information protected by any and all rights of privacy
2 under the United States Constitution or any other applicable law, or that is otherwise prohibited
3 from disclosure because to do so would cause Responding Party to violate legal and/or
4 contractual obligations to any other persons or entities.

5 Responding Party objects to this request on the grounds that, to the extent it seeks
6 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
7 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
8 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
9 action, and not reasonably calculated to lead to the discovery of admissible evidence.

10 Responding Party objects on the grounds that the “Relevant Time Period” and the time
11 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
12 request not reasonably calculated to lead to the discovery of admissible evidence as the
13 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
14 is November 25, 2007.

15 Responding Party objects to the extent this request seeks documents that are no longer
16 active or readily accessible in electronic form which renders this request overly broad and unduly
17 burdensome.

18 Responding Party objects to the extent this request seeks documents or information that is
19 not within the possession, custody, or control of Responding Party.

20 Responding Party objects to the extent this request seeks documents or information that
21 require discovery of information and materials from third-parties or sources that are equally if not
22 more accessible to Plaintiffs.

23 Responding Party objects to the extent this request seeks documents or information that
24 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

25 Responding Party objects on the grounds that, to the extent this request seeks documents
26 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
27 information that is not relevant to the claim or defense of any party, not relevant to the subject
28 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible

1 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
2 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

3 Responding Party objects on the grounds that, to the extent Responding Party produces
4 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
5 produced again.

6 Responding Party objects that to the extent documents responsive to this request have
7 previously been produced, they will not be produced again.

8 Subject to and without waiving the general and specific objections stated above,
9 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
10 identify documents responsive to this request within the Limitations Period and, if any, will
11 produce non-privileged, responsive documents.

12 **REQUEST NO. 13:**

13 Documents sufficient to show your inventory levels of CRTs or CRT Products for each
14 month, quarter, calendar year or fiscal year from January 1, 1991 through the present.

15 **RESPONSE TO REQUEST NO. 13:**

16 Responding Party reasserts and incorporates each of the General Objections and
17 Objections to Definitions and Instructions set forth above.

18 Responding Party objects to this request on the grounds that it is overly broad, unduly
19 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
20 including to the extent that it seeks the discovery of documents regarding Responding Party’s
21 sales outside of the United States and unrelated to United States commerce, as such sales are
22 beyond the scope of this litigation and thereby render the Document Requests overly broad,
23 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Responding Party objects to this request on the grounds that it seeks production of
26 documents protected by the attorney-client privilege, work product doctrine, joint defense or
27 common interest privilege, or by any other applicable doctrine or privilege.

28 Responding Party objects to this request on the grounds it seeks information and/or

1 documents that would disclose confidential information protected by any and all rights of privacy
2 under the United States Constitution or any other applicable law, or that is otherwise prohibited
3 from disclosure because to do so would cause Responding Party to violate legal and/or
4 contractual obligations to any other persons or entities.

5 Responding Party objects to this request on the grounds that, to the extent it seeks
6 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
7 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
8 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
9 action, and not reasonably calculated to lead to the discovery of admissible evidence.

10 Responding Party objects on the grounds that the “Relevant Time Period” and the time
11 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
12 request not reasonably calculated to lead to the discovery of admissible evidence as the
13 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
14 is November 25, 2007.

15 Responding Party objects to the extent this request seeks documents that are no longer
16 active or readily accessible in electronic form which renders this request overly broad and unduly
17 burdensome.

18 Responding Party objects that the definition of the term “your” is vague, ambiguous, and
19 unintelligible, rendering the request overly broad and unduly burdensome, not relevant, and not
20 reasonably calculated to lead to the discovery of admissible evidence.

21 Responding Party objects that the term “inventory levels” is vague, ambiguous, and
22 unintelligible, rendering the request overly broad and unduly burdensome, not relevant, and not
23 reasonably calculated to lead to the discovery of admissible evidence.

24 Responding Party objects on the grounds that, to the extent this request seeks documents
25 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
26 information that is not relevant to the claim or defense of any party, not relevant to the subject
27 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
28 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals

1 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

2 Responding Party objects on the grounds that, to the extent Responding Party produces
3 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
4 produced again.

5 Responding Party objects that to the extent documents responsive to this request have
6 previously been produced, they will not be produced again.

7 Subject to and without waiving the general and specific objections stated above,
8 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
9 identify documents responsive to this request within the Limitations Period and, if any, will
10 produce non-privileged, responsive documents.

11 **REQUEST NO. 14:**

12 All documents relating to sales, swaps, trades, product licensing or marketing agreements,
13 purchases or transfers of CRTs or CRT Products between you and any of your affiliates, or
14 between you and any other manufacturer of CRTs or CRT Products, and the price or any other
15 consideration involved in every such sale, swap, trade, agreement, purchase or transfer.

16 **RESPONSE TO REQUEST NO. 14:**

17 Responding Party reasserts and incorporates each of the General Objections and
18 Objections to Definitions and Instructions set forth above.

19 Responding Party objects to this request on the grounds that it is overly broad, unduly
20 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
21 including to the extent that it seeks the discovery of documents regarding Responding Party’s
22 sales outside of the United States and unrelated to United States commerce, as such sales are
23 beyond the scope of this litigation and thereby render the Document Requests overly broad,
24 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request on the grounds that it seeks production of
27 documents protected by the attorney-client privilege, work product doctrine, joint defense or
28 common interest privilege, or by any other applicable doctrine or privilege.

1 Responding Party objects to this request on the grounds it seeks information and/or
2 documents that would disclose confidential information, third-party confidential information
3 and/or proprietary business information protected by any and all rights of privacy under the
4 United States Constitution or any other applicable law, or that is otherwise prohibited from
5 disclosure because to do so would cause Responding Party to violate legal and/or contractual
6 obligations to any other persons or entities.

7 Responding Party objects to this request on the grounds that, to the extent it seeks
8 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
9 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
10 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
11 action, and not reasonably calculated to lead to the discovery of admissible evidence.

12 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
13 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
14 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
15 of the alleged class period is November 25, 2007.

16 Responding Party objects to the extent this request seeks documents that are no longer
17 active or readily accessible in electronic form which renders this request overly broad and unduly
18 burdensome.

19 Responding Party objects that the definition of the terms “you” and “your” are vague,
20 ambiguous, and unintelligible, rendering the request overly broad and unduly burdensome, not
21 relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

22 Responding Party objects that the terms “affiliates,” “swaps,” “trades,” “product licensing
23 or marketing agreements,” and “transfers” are vague, ambiguous, and unintelligible, rendering the
24 request overly broad and unduly burdensome, not relevant and not reasonably calculated to lead
25 to the discovery of admissible evidence.

26 Responding Party objects to this request on the grounds that, to the extent it seeks
27 documents related to “purchases,” it seeks documents and information not related to the
28 allegations in the Complaint, the request is overly broad and unduly burdensome, and purports to

1 call for information that is not relevant to the claim or defense of any party, not relevant to the
 2 subject matter involved in this action, and not reasonably calculated to lead to the discovery of
 3 admissible evidence.

4 Responding Party objects on the grounds that, to the extent this request seeks documents
 5 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 6 information that is not relevant to the claim or defense of any party, not relevant to the subject
 7 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 8 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 9 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

10 Responding Party objects on the grounds that, to the extent Responding Party produces
 11 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
 12 produced again.

13 Responding Party objects that to the extent documents responsive to this request have
 14 previously been produced, they will not be produced again.

15 Subject to and without waiving the general and specific objections stated above,
 16 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 17 identify documents responsive to this request within the Limitations Period and, if any, will
 18 produce non-privileged, responsive documents.

19 **REQUEST NO. 15:**

20 All documents and electronic data relating to the relationship between prices for CRTs or
 21 CRT Products and costs of producing, marketing, selling, or distributing CRTs or CRT Products
 22 during the period January 1, 1991 through the present.

23 **RESPONSE TO REQUEST NO. 15:**

24 Responding Party reasserts and incorporates each of the General Objections and
 25 Objections to Definitions and Instructions set forth above.

26 Responding Party objects to this request on the grounds that it is overly broad, unduly
 27 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 28 including to the extent that it seeks the discovery of documents regarding Responding Party’s

1 sales outside of the United States and unrelated to United States commerce, as such sales are
2 beyond the scope of this litigation and thereby render the Document Requests overly broad,
3 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Responding Party objects to this request on the grounds that it seeks production of
6 documents protected by the attorney-client privilege, work product doctrine, joint defense or
7 common interest privilege, or by any other applicable doctrine or privilege.

8 Responding Party objects to this request on the grounds it seeks information and/or
9 documents that would disclose confidential information protected by any and all rights of privacy
10 under the United States Constitution or any other applicable law, or that is otherwise prohibited
11 from disclosure because to do so would cause Responding Party to violate legal and/or
12 contractual obligations to any other persons or entities.

13 Responding Party objects to this request on the grounds that, to the extent it seeks
14 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
15 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
16 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
17 action, and not reasonably calculated to lead to the discovery of admissible evidence.

18 Responding Party objects on the grounds that the “Relevant Time Period” and the time
19 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
20 request not reasonably calculated to lead to the discovery of admissible evidence as the
21 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
22 is November 25, 2007.

23 Responding Party objects to the extent this request seeks documents that are no longer
24 active or readily accessible in electronic form which renders this request overly broad and unduly
25 burdensome.

26 Responding Party objects to the extent this request seeks documents or information that is
27 not within the possession, custody, or control of Responding Party.

28 Responding Party objects that the phrase “relationship between prices” is vague,

1 ambiguous, and unintelligible, rendering this request overly broad and unduly burdensome, not
2 relevant and not reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects to the extent this request seeks documents or information that
4 require discovery of information and materials from third-parties or sources that are equally if not
5 more accessible to Plaintiffs.

6 Responding Party objects to the extent this request seeks document relating to “costs of
7 producing, marketing, selling, or distributing CRT or CRT Products,” it is duplicative of Request
8 No. 12 of the Document Requests.

9 Responding Party objects to the extent this request seeks documents concerning the
10 “prices of CRTs” and “costs of producing” CRTs, this request is duplicative of Requests Nos. 8
11 and 12 of the Document Requests.

12 Responding Party objects to the extent this request seeks documents or information that
13 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

14 Responding Party objects on the grounds that, to the extent this request seeks documents
15 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
16 information that is not relevant to the claim or defense of any party, not relevant to the subject
17 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
18 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
19 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

20 Responding Party objects on the grounds that, to the extent Responding Party produces
21 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
22 produced again.

23 Responding Party objects that to the extent documents responsive to this request have
24 previously been produced, they will not be produced again.

25 Subject to and without waiving the general and specific objections stated above,
26 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
27 identify documents responsive to this request within the Limitations Period and, if any, will
28 produce non-privileged, responsive documents.

REQUEST NO. 16:

All of your internal and public annual, quarterly and monthly financial statements, summaries or analyses, including profit and loss statements and comparisons to budget that relate to CRTs or CRT Products.

RESPONSE TO REQUEST NO. 16:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information, protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad

1 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 2 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
 3 of the alleged class period is November 25, 2007.

4 Responding Party objects to the extent this request seeks documents or information that is
 5 not within the possession, custody, or control of Responding Party.

6 Responding Party objects on the grounds that, to the extent this request seeks documents
 7 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 8 information that is not relevant to the claim or defense of any party, not relevant to the subject
 9 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 10 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 11 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

12 Responding Party objects on the grounds that, to the extent Responding Party produces
 13 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
 14 produced again.

15 Responding Party objects that to the extent documents responsive to this request have
 16 previously been produced, they will not be produced again.

17 Subject to and without waiving the general and specific objections stated above,
 18 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 19 identify documents responsive to this request within the Limitations Period and, if any, will
 20 produce non-privileged, responsive documents.

21 **REQUEST NO. 17:**

22 All business plans, planning analyses, budgets, forecasts, or sales or profit projections
 23 relating to CRTs or CRT Products.

24 **RESPONSE TO REQUEST NO. 17:**

25 Responding Party reasserts and incorporates each of the General Objections and
 26 Objections to Definitions and Instructions set forth above.

27 Responding Party objects to this request on the grounds that it is overly broad, unduly
 28 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence

1 including to the extent that it seeks the discovery of documents regarding Responding Party's
2 sales outside of the United States and unrelated to United States commerce, as such sales are
3 beyond the scope of this litigation and thereby render the Document Requests overly broad,
4 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request on the grounds that it seeks production of
7 documents protected by the attorney-client privilege, work product doctrine, joint defense or
8 common interest privilege, or by any other applicable doctrine or privilege.

9 Responding Party objects to this request on the grounds it seeks information and/or
10 documents that would disclose confidential information, protected by any and all rights of privacy
11 under the United States Constitution or any other applicable law, or that is otherwise prohibited
12 from disclosure because to do so would cause Responding Party to violate legal and/or
13 contractual obligations to any other persons or entities.

14 Responding Party objects to this request on the grounds that, to the extent it seeks
15 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
16 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
17 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
18 action, and not reasonably calculated to lead to the discovery of admissible evidence.

19 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
20 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
21 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
22 of the alleged class period is November 25, 2007.

23 Responding Party objects to the extent this request seeks documents that are no longer
24 active or readily accessible in electronic form which renders this request overly broad and unduly
25 burdensome.

26 Responding Party objects to the extent this request seeks documents or information that is
27 not within the possession, custody, or control of Responding Party.

28 Responding Party objects that the phrase "business plans, planning analyses, budgets,

forecasts, or sales or profit projections” is vague, ambiguous, and unintelligible, rendering this request overly broad and unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to the extent this request seeks documents or information that require discovery of information and materials from third-parties or sources that are equally if not more accessible to Plaintiffs.

Responding Party objects to the extent this request seeks documents or information that will be the subject of expert discovery, as expert discovery has not commenced in this matter.

Responding Party objects on the grounds that, to the extent this request seeks documents related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

Responding Party objects on the grounds that, to the extent Responding Party produces documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be produced again.

Responding Party objects that to the extent documents responsive to this request have previously been produced, they will not be produced again.

Subject to and without waiving the general and specific objections stated above, Responding Party responds that it will make reasonable, not unduly burdensome efforts to identify documents responsive to this request within the Limitations Period and, if any, will produce non-privileged, responsive documents.

REQUEST NO. 18:

Documents sufficient to show the identity of all other producers or sellers of CRTs or CRT Products during any portion of the relevant period.

RESPONSE TO REQUEST NO. 18:

Responding Party reasserts and incorporates each of the General Objections and

1 Objections to Definitions and Instructions set forth above.

2 Responding Party objects to this request on the grounds that it is overly broad, unduly
3 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
4 including to the extent that it seeks the discovery of documents regarding Responding Party's
5 sales outside of the United States and unrelated to United States commerce, as such sales are
6 beyond the scope of this litigation and thereby render the Document Requests overly broad,
7 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Responding Party objects to this request on the grounds that it seeks production of
10 documents protected by the attorney-client privilege, work product doctrine, joint defense or
11 common interest privilege, or by any other applicable doctrine or privilege.

12 Responding Party also objects on the grounds it seeks information and/or documents that
13 would disclose confidential information protected by any and all rights of privacy under the
14 United States Constitution or any other applicable law, or that is otherwise prohibited from
15 disclosure because to do so would cause Responding Party to violate legal and/or contractual
16 obligations to any other persons or entities.

17 Responding Party objects on the grounds that, to the extent it requests documents
18 regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous,
19 overly broad and unduly burdensome, and purports to call for information that is not relevant to
20 the claim or defense of any party, not relevant to the subject matter involved in this action, and
21 not reasonably calculated to lead to the discovery of admissible evidence.

22 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
23 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
24 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
25 of the alleged class period is November 25, 2007.

26 Responding Party objects to the extent this request seeks documents that are no longer
27 active or readily accessible in electronic form which renders this request overly broad and unduly
28 burdensome.

1 Responding Party objects to the extent this request seeks documents or information that is
2 not within the possession, custody, or control of Responding Party.

3 Responding Party objects that by seeking documents and information regarding “all other
4 producers or sellers of CRT or CRT Products,” the request is overly broad and unduly
5 burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible
6 evidence.

7 Responding Party objects to the extent this request seeks documents or information that
8 require discovery of information and materials from third-parties or sources that are equally if not
9 more accessible to Plaintiffs.

10 Responding Party objects to the extent this request seeks documents or information that
11 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

12 Responding Party objects on the grounds that, to the extent this request seeks documents
13 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
14 information that is not relevant to the claim or defense of any party, not relevant to the subject
15 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
16 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
17 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

18 Responding Party objects on the grounds that, to the extent Responding Party produces
19 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
20 produced again.

21 Responding Party objects that to the extent documents responsive to this request have
22 previously been produced, they will not be produced again.

23 Subject to and without waiving the general and specific objections stated above,
24 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
25 identify documents responsive to this request within the Limitations Period and, if any, will
26 produce non-privileged, responsive documents.

27 **REQUEST NO. 19:**

28 All documents relating to your percentage or share of industry production, capacity, sales

1 or shipments of CRTs or CRT Products, or the percentage or share of industry production,
 2 capacity, sales or shipments of any other producer or seller of CRTs or CRT Products at any time
 3 during the period January 1, 1991 through the present.

4 **RESPONSE TO REQUEST NO. 19:**

5 Responding Party reasserts and incorporates each of the General Objections and
 6 Objections to Definitions and Instructions set forth above.

7 Responding Party objects to this request on the grounds that it is overly broad, unduly
 8 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 9 including to the extent that it seeks the discovery of documents regarding Responding Party's
 10 sales outside of the United States and unrelated to United States commerce, as such sales are
 11 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 12 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 13 evidence.

14 Responding Party objects to this request on the grounds that it seeks production of
 15 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 16 common interest privilege, or by any other applicable doctrine or privilege.

17 Responding Party also objects on the grounds it seeks information and/or documents that
 18 would disclose confidential information, protected by any and all rights of privacy under the
 19 United States Constitution or any other applicable law, or that is otherwise prohibited from
 20 disclosure because to do so would cause Responding Party to violate legal and/or contractual
 21 obligations to any other persons or entities.

22 Responding Party objects to this request on the grounds that, to the extent it requests
 23 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 24 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 25 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 26 action, and not reasonably calculated to lead to the discovery of admissible evidence.

27 Responding Party objects on the grounds that the "Relevant Time Period" and the time
 28 period "January 1, 1991 through the present" is overly broad and not relevant, rendering the

1 request not reasonably calculated to lead to the discovery of admissible evidence as the
2 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
3 is November 25, 2007.

4 Responding Party objects to the extent this request seeks documents that are no longer
5 active or readily accessible in electronic form which renders this request overly broad and unduly
6 burdensome.

7 Responding Party objects to the extent this request seeks documents or information that is
8 not within the possession, custody, or control of Responding Party.

9 Responding Party objects that the phrase “percentage or share of industry production,
10 capacity, sales or shipments” is vague, ambiguous, and unintelligible, rendering this request
11 overly broad and unduly burdensome, not relevant and not reasonably calculated to lead to the
12 discovery of admissible evidence.

13 Responding Party objects to the extent this request seeks documents or information that
14 require discovery of information and materials from third-parties or sources that are equally if not
15 more accessible to Plaintiffs.

16 Responding Party objects to the extent this request seeks documents or information that
17 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

18 Responding Party objects on the grounds that, to the extent this request seeks documents
19 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
20 information that is not relevant to the claim or defense of any party, not relevant to the subject
21 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
22 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
23 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

24 Responding Party objects on the grounds that, to the extent Responding Party produces
25 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
26 produced again.

27 Responding Party objects that to the extent documents responsive to this request have
28 previously been produced, they will not be produced again.

1 Subject to and without waiving the general and specific objections stated above,
 2 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 3 identify documents responsive to this request within the Limitations Period and, if any, will
 4 produce non-privileged, responsive documents.

5 **REQUEST NO. 20:**

6 All documents showing the dollar volume or quantity of sales or shipments of CRTs or
 7 CRT Products (by type or category, if available), by you or by other producers or sellers of CRTs
 8 or CRT Products by month, quarter, calendar year or fiscal year during the period January 1, 1991
 9 through the present.

10 **RESPONSE TO REQUEST NO. 20:**

11 Responding Party reasserts and incorporates each of the General Objections and
 12 Objections to Definitions and Instructions set forth above.

13 Responding Party objects to this request on the grounds that it is overly broad, unduly
 14 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 15 including to the extent that it seeks the discovery of documents regarding Responding Party's
 16 sales outside of the United States and unrelated to United States commerce, as such sales are
 17 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 18 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 19 evidence.

20 Responding Party objects to this request on the grounds that it seeks production of
 21 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 22 common interest privilege, or by any other applicable doctrine or privilege.

23 Responding Party objects to this request on the grounds it seeks information and/or
 24 documents that would disclose confidential information, protected by any and all rights of privacy
 25 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 26 from disclosure because to do so would cause Responding Party to violate legal and/or
 27 contractual obligations to any other persons or entities.

28 Responding Party objects to this request on the grounds that, to the extent it seeks

1 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
2 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
3 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
4 action, and not reasonably calculated to lead to the discovery of admissible evidence.

5 Responding Party objects on the grounds that the “Relevant Time Period” and the time
6 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
7 request not reasonably calculated to lead to the discovery of admissible evidence as the
8 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
9 is November 25, 2007.

10 Responding Party objects to the extent this request seeks documents that are no longer
11 active or readily accessible in electronic form which renders this request overly broad and unduly
12 burdensome.

13 Responding Party objects to the extent this request seeks documents or information that is
14 not within the possession, custody, or control of Responding Party.

15 Responding Party objects that the phrase “dollar volume” is vague, ambiguous, and
16 unintelligible, rendering the request overly broad and unduly burdensome, not relevant and not
17 reasonably calculated to lead to the discovery of admissible evidence.

18 Responding Party objects to the extent it seeks documents relating to the “quantity of sales
19 or shipments of CRT or CRT Products,” this request is duplicative of Request No. 5 of the
20 Document Requests.

21 Responding Party objects to the extent this request seeks documents or information that
22 require discovery of information and materials from third-parties or sources that are equally if not
23 more accessible to Plaintiffs.

24 Responding Party objects to the extent this request seeks documents or information that
25 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

26 Responding Party objects on the grounds that, to the extent this request seeks documents
27 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
28 information that is not relevant to the claim or defense of any party, not relevant to the subject

1 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 2 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 3 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

4 Responding Party objects on the grounds that, to the extent Responding Party produces
 5 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
 6 produced again.

7 Responding Party objects that to the extent documents responsive to this request have
 8 previously been produced, they will not be produced again.

9 Subject to and without waiving the general and specific objections stated above,
 10 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 11 identify documents responsive to this request within the Limitations Period and, if any, will
 12 produce non-privileged, responsive documents.

13 **REQUEST NO. 21:**

14 All documents that compare or contrast each type, class or category of CRTs or CRT
 15 Products produced or sold by you with that of another producer or seller of CRTs or CRT
 16 Products and all documents that relate to any industry standards regarding types, classes or
 17 categories of CRTs or CRT Products.

18 **RESPONSE TO REQUEST NO. 21:**

19 Responding Party reasserts and incorporates each of the General Objections and
 20 Objections to Definitions and Instructions set forth above.

21 Responding Party objects to this request on the grounds that it is overly broad, unduly
 22 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 23 including to the extent that it seeks the discovery of documents regarding Responding Party’s
 24 sales outside of the United States and unrelated to United States commerce, as such sales are
 25 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 26 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 27 evidence.

28 Responding Party objects to this request on the grounds that it seeks production of

1 documents protected by the attorney-client privilege, work product doctrine, joint defense or
2 common interest privilege, or by any other applicable doctrine or privilege.

3 Responding Party objects to this request on the grounds it seeks information and/or
4 documents that would disclose confidential information protected by any and all rights of privacy
5 under the United States Constitution or any other applicable law, or that is otherwise prohibited
6 from disclosure because to do so would cause Responding Party to violate legal and/or
7 contractual obligations to any other persons or entities.

8 Responding Party objects to this request on the grounds that, to the extent it seeks
9 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
10 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
11 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
12 action, and not reasonably calculated to lead to the discovery of admissible evidence.

13 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
14 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
15 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
16 of the alleged class period is November 25, 2007.

17 Responding Party objects to the extent this request seeks documents that are no longer
18 active or readily accessible in electronic form which renders this request overly broad and unduly
19 burdensome.

20 Responding Party objects to the extent this request seeks documents or information that is
21 not within the possession, custody, or control of Responding Party.

22 Responding Party objects that the phrases “compare or contrast,” “another producer,” and
23 “industry standards” are vague, ambiguous, and unintelligible, rendering this request overly broad
24 and unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Responding Party objects to the extent this request seeks documents or information that
27 require discovery of information and materials from third-parties or sources that are equally if not
28 more accessible to Plaintiffs.

1 Responding Party objects to the extent this request seeks documents or information that
2 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

3 Responding Party objects on the grounds that, to the extent this request seeks documents
4 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
5 information that is not relevant to the claim or defense of any party, not relevant to the subject
6 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
7 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
8 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

9 Responding Party objects on the grounds that, to the extent Responding Party produces
10 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
11 produced again.

12 Responding Party objects that to the extent documents responsive to this request have
13 previously been produced, they will not be produced again.

14 Subject to and without waiving the general and specific objections stated above,
15 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
16 identify documents responsive to this request within the Limitations Period and, if any, will
17 produce non-privileged, responsive documents.

18 **REQUEST NO. 22:**

19 Documents sufficient to show the regions or territories in which each type, class or
20 category of CRTs or CRT Products are sold in the United States.

21 **RESPONSE TO REQUEST NO. 22:**

22 Responding Party reasserts and incorporates each of the General Objections and
23 Objections to Definitions and Instructions set forth above.

24 Responding Party objects to this request on the grounds that it is overly broad, unduly
25 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
26 including to the extent that it seeks the discovery of documents regarding Responding Party’s
27 sales outside of the United States and unrelated to United States commerce, as such sales are
28 beyond the scope of this litigation and thereby render the Document Requests overly broad,

1 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Responding Party objects to this request on the grounds that it seeks production of
4 documents protected by the attorney-client privilege, work product doctrine, joint defense or
5 common interest privilege, or by any other applicable doctrine or privilege.

6 Responding Party objects to this request on the grounds it seeks information and/or
7 documents that would disclose confidential information protected by any and all rights of privacy
8 under the United States Constitution or any other applicable law, or that is otherwise prohibited
9 from disclosure because to do so would cause Responding Party to violate legal and/or
10 contractual obligations to any other persons or entities.

11 Responding Party objects to this request on the grounds that, to the extent it seeks
12 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
13 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
14 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
15 action, and not reasonably calculated to lead to the discovery of admissible evidence.

16 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
17 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
18 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
19 of the alleged class period is November 25, 2007.

20 Responding Party objects to the extent this request seeks documents that are no longer
21 active or readily accessible in electronic form which renders this request overly broad and unduly
22 burdensome.

23 Responding Party objects to the extent this request seeks documents or information that is
24 not within the possession, custody, or control of Responding Party.

25 Responding Party objects to the extent this request seeks documents or information that
26 require discovery of information and materials from third-parties or sources that are equally if not
27 more accessible to Plaintiffs.

28 Responding Party objects to the extent this request seeks documents or information that

1 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

2 Responding Party objects on the grounds that, to the extent this request seeks documents
3 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
4 information that is not relevant to the claim or defense of any party, not relevant to the subject
5 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
6 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
7 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

8 Responding Party objects on the grounds that, to the extent Responding Party produces
9 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
10 produced again.

11 Responding Party objects that to the extent documents responsive to this request have
12 previously been produced, they will not be produced again.

13 Subject to and without waiving the general and specific objections stated above,
14 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
15 identify documents responsive to this request within the Limitations Period and, if any, will
16 produce non-privileged, responsive documents.

17 **REQUEST NO. 23:**

18 All documents relating to conditions of supply and demand for CRTs or CRT Products,
19 including, but not limited to, any market studies or industry reports during the period January 1,
20 1991 through the present.

21 **RESPONSE TO REQUEST NO. 23:**

22 Responding Party reasserts and incorporates each of the General Objections and
23 Objections to Definitions and Instructions set forth above.

24 Responding Party objects to this request on the grounds that it is overly broad, unduly
25 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
26 including to the extent that it seeks the discovery of documents regarding Responding Party’s
27 sales outside of the United States and unrelated to United States commerce, as such sales are
28 beyond the scope of this litigation and thereby render the Document Requests overly broad,

1 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
2 evidence.

3 Responding Party objects to this request on the grounds that it seeks production of
4 documents protected by the attorney-client privilege, work product doctrine, joint defense or
5 common interest privilege, or by any other applicable doctrine or privilege.

6 Responding Party objects to this request on the grounds it seeks information and/or
7 documents that would disclose confidential information protected by any and all rights of privacy
8 under the United States Constitution or any other applicable law, or that is otherwise prohibited
9 from disclosure because to do so would cause Responding Party to violate legal and/or
10 contractual obligations to any other persons or entities.

11 Responding Party objects to this request on the grounds that, to the extent it requests
12 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
13 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
14 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
15 action, and not reasonably calculated to lead to the discovery of admissible evidence.

16 Responding Party objects on the grounds that the “Relevant Time Period” and the time
17 period “January 1, 1991 through the present” is overly broad and not relevant, rendering the
18 request not reasonably calculated to lead to the discovery of admissible evidence as the
19 Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period
20 is November 25, 2007.

21 Responding Party objects to the extent this request seeks documents that are no longer
22 active or readily accessible in electronic form which renders this request overly broad and unduly
23 burdensome.

24 Responding Party objects to the extent this request seeks documents or information that is
25 not within the possession, custody, or control of Responding Party.

26 Responding Party objects that the phrases “relating to conditions of supply and demand”
27 and “market studies or industry reports” are vague, ambiguous, and unintelligible, rendering the
28 request overly broad and unduly burdensome, not relevant and not reasonably calculated to lead

1 to the discovery of admissible evidence.

2 Responding Party objects to the extent this request seeks documents or information that
3 require discovery of information and materials from third-parties or sources that are equally if not
4 more accessible to Plaintiffs.

5 Responding Party objects to the extent this request seeks documents or information that
6 will be the subject of expert discovery, as expert discovery has not commenced in this matter.

7 Responding Party objects on the grounds that, to the extent this request seeks documents
8 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
9 information that is not relevant to the claim or defense of any party, not relevant to the subject
10 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
11 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
12 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

13 Responding Party objects on the grounds that, to the extent Responding Party produces
14 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
15 produced again.

16 Responding Party objects that to the extent documents responsive to this request have
17 previously been produced, they will not be produced again.

18 Subject to and without waiving the general and specific objections stated above,
19 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
20 identify documents responsive to this request within the Limitations Period and, if any, will
21 produce non-privileged, responsive documents.

22 **REQUEST NO. 24:**

23 All documents relating to any contemplated, proposed, planned, pending or executed
24 purchases, sales, acquisitions, mergers, joint ventures, divestitures, transfers, spin-offs or any
25 other change in ownership of any assets, liabilities, subsidiaries, departments, units or other
26 subdivisions of your company relating to the production, distribution, marketing, pricing, sale of
27 resale of CRTs or CRT Products during the relevant time period.

RESPONSE TO REQUEST NO. 24:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period is November 25, 2007.

Responding Party objects to the extent this request seeks documents that are no longer

1 active or readily accessible in electronic form which renders this request overly broad and unduly
2 burdensome.

3 Responding Party objects to the extent this request seeks documents or information that is
4 not within the possession, custody, or control of Responding Party.

5 Responding Party objects that the definition of the term “your” renders the request vague,
6 ambiguous, and unintelligible, overly broad and unduly burdensome, not relevant, and not
7 reasonably calculated to lead to the discovery of admissible evidence.

8 Responding Party objects that the terms “contemplated,” “proposed,” “planned,”
9 “pending,” and “executed” are vague, ambiguous, and unintelligible, rendering this request overly
10 broad and unduly burdensome, not relevant and not reasonably calculated to lead to the discovery
11 of admissible evidence.

12 Responding Party objects to the extent this request seeks documents or information that
13 require discovery of information and materials from third-parties or sources that are equally if not
14 more accessible to Plaintiffs.

15 Responding Party objects to the extent this request seeks documents and information that
16 would require disclosure of Responding Party’s or a third-party’s respective trade secrets or other
17 confidential information protected by the Uniform Trade Secrets Act, *et. seq.*, any and all rights
18 of privacy under the United States Constitution, or Article One of the California State
19 Constitution or other state constitutions, or any other applicable law, or which is otherwise
20 prohibited from disclosure because to do so would cause Responding Party to violate legal or
21 contractual obligations to any other persons or entities.

22 Responding Party objects that this request is overly broad and unduly burdensome, and
23 the burden it places on Responding Party far outweighs any likely benefit to Plaintiffs under Rule
24 26(b)(2)(C)(iii) of the Federal Rules of Civil Procedure.

25 Responding Party objects on the grounds that, to the extent this request seeks documents
26 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
27 information that is not relevant to the claim or defense of any party, not relevant to the subject
28 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible

1 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
2 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

3 Responding Party objects on the grounds that, to the extent Responding Party produces
4 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
5 produced again.

6 Responding Party objects that to the extent documents responsive to this request have
7 previously been produced, they will not be produced again.

8 Subject to and without waiving the general and specific objections stated above,
9 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
10 identify documents responsive to this request within the Limitations Period and, if any, will
11 produce non-privileged, responsive documents.

12 **REQUEST NO. 25:**

13 All documents relating to any communications between you and any parent, subsidiary,
14 affiliated company, joint venturer, or partner regarding the production, pricing, marketing, sale or
15 distribution of CRTs or CRT Products.

16 **RESPONSE TO REQUEST NO. 25:**

17 Responding Party reasserts and incorporates each of the General Objections and
18 Objections to Definitions and Instructions set forth above.

19 Responding Party objects to this request on the grounds that it is overly broad, unduly
20 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
21 including to the extent that it seeks the discovery of documents regarding Responding Party’s
22 sales outside of the United States and unrelated to United States commerce, as such sales are
23 beyond the scope of this litigation and thereby render the Document Requests overly broad,
24 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request on the grounds that it seeks production of
27 documents protected by the attorney-client privilege, work product doctrine, joint defense or
28 common interest privilege, or by any other applicable doctrine or privilege.

1 Responding Party objects to this request on the grounds it seeks information and/or
2 documents that would disclose confidential information protected by any and all rights of privacy
3 under the United States Constitution or any other applicable law, or that is otherwise prohibited
4 from disclosure because to do so would cause Responding Party to violate legal and/or
5 contractual obligations to any other persons or entities.

6 Responding Party objects to this request on the grounds that, to the extent it seeks
7 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
8 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
9 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
10 action, and not reasonably calculated to lead to the discovery of admissible evidence.

11 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
12 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
13 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
14 of the alleged class period is November 25, 2007.

15 Responding Party objects to the extent this request seeks documents that are no longer
16 active or readily accessible in electronic form which renders this request overly broad and unduly
17 burdensome.

18 Responding Party objects to the extent this request seeks documents or information that is
19 not within the possession, custody, or control of Responding Party.

20 Responding Party objects that the phrases “affiliated company” and “joint venturer” are
21 vague, ambiguous, and unintelligible, rendering this request overly broad and unduly
22 burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Responding Party objects to the extent this request seeks documents or information that
25 require discovery of information and materials from third-parties or sources that are equally if not
26 more accessible to Plaintiffs.

27 Responding Party objects that this request is overly broad and unduly burdensome, and
28 the burden it places on Responding Party far outweighs any likely benefit to Plaintiffs under Rule

1 26(b)(2)(C)(iii) of the Federal Rules of Civil Procedure.

2 Responding Party objects on the grounds that, to the extent this request seeks documents
3 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
4 information that is not relevant to the claim or defense of any party, not relevant to the subject
5 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
6 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
7 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

8 Responding Party objects on the grounds that, to the extent Responding Party produces
9 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
10 produced again.

11 Responding Party objects that to the extent documents responsive to this request have
12 previously been produced, they will not be produced again.

13 Subject to and without waiving the general and specific objections stated above,
14 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
15 identify documents responsive to this request within the Limitations Period and, if any, will
16 produce non-privileged, responsive documents.

17 **REQUEST NO. 26:**

18 All documents relating to communications regarding CRTs or CRT Products between or
19 among manufacturers of CRTs or CRT Products, including Defendants.

20 **RESPONSE TO REQUEST NO. 26:**

21 Responding Party reasserts and incorporates each of the General Objections and
22 Objections to Definitions and Instructions set forth above.

23 Responding Party objects to this request on the grounds that it is overly broad, unduly
24 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
25 including to the extent that it seeks the discovery of documents regarding Responding Party’s
26 sales outside of the United States and unrelated to United States commerce, as such sales are
27 beyond the scope of this litigation and thereby render the Document Requests overly broad,
28 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

1 evidence.

2 Responding Party objects to this request on the grounds that it seeks production of
3 documents protected by the attorney-client privilege, work product doctrine, joint defense or
4 common interest privilege, or by any other applicable doctrine or privilege.

5 Responding Party objects to this request on the grounds it seeks information and/or
6 documents that would disclose confidential information protected by any and all rights of privacy
7 under the United States Constitution or any other applicable law, or that is otherwise prohibited
8 from disclosure because to do so would cause Responding Party to violate legal and/or
9 contractual obligations to any other persons or entities.

10 Responding Party objects to this request on the grounds that, to the extent it seeks
11 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
12 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
13 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
14 action, and not reasonably calculated to lead to the discovery of admissible evidence.

15 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
16 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
17 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
18 of the alleged class period is November 25, 2007.

19 Responding Party objects to the extent this request seeks documents that are no longer
20 active or readily accessible in electronic form which renders this request overly broad and unduly
21 burdensome.

22 Responding Party objects to the extent this request seeks documents or information that is
23 not within the possession, custody, or control of Responding Party.

24 Responding Party objects to the extent this request seeks documents or information that
25 require discovery of information and materials from third-parties or sources that are equally if not
26 more accessible to Plaintiffs.

27 Responding Party objects that the phrase “relating to” is vague, ambiguous and
28 unintelligible, and renders the request unlimited in scope, overly broad and unduly burdensome,

1 not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

2 Responding Party objects on the grounds that, to the extent this request seeks documents
3 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
4 information that is not relevant to the claim or defense of any party, not relevant to the subject
5 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
6 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
7 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

8 Responding Party objects on the grounds that, to the extent Responding Party produces
9 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
10 produced again.

11 Responding Party objects that to the extent documents responsive to this request have
12 previously been produced, they will not be produced again.

13 Subject to and without waiving the general and specific objections stated above,
14 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
15 identify documents responsive to this request within the Limitations Period and, if any, will
16 produce non-privileged, responsive documents.

17 **REQUEST NO. 27:**

18 All documents relating to any meeting attended by you or any other Defendant or any
19 manufacturer of CRTs or CRT Products during which there was any communication regarding
20 the production, marketing, pricing, distribution, inventory levels or sale of CRTs or CRT
21 Products, including, but not limited to the notes of any such meeting.

22 **RESPONSE TO REQUEST NO. 27:**

23 Responding Party reasserts and incorporates each of the General Objections and
24 Objections to Definitions and Instructions set forth above.

25 Responding Party objects to this request on the grounds that it is overly broad, unduly
26 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
27 including to the extent that it seeks the discovery of documents regarding Responding Party’s
28 sales outside of the United States and unrelated to United States commerce, as such sales are

1 beyond the scope of this litigation and thereby render the Document Requests overly broad,
2 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request on the grounds that it seeks production of
5 documents protected by the attorney-client privilege, work product doctrine, joint defense or
6 common interest privilege, or by any other applicable doctrine or privilege.

7 Responding Party objects to this request on the grounds it seeks information and/or
8 documents that would disclose confidential information protected by any and all rights of privacy
9 under the United States Constitution or any other applicable law, or that is otherwise prohibited
10 from disclosure because to do so would cause Responding Party to violate legal and/or
11 contractual obligations to any other persons or entities.

12 Responding Party objects to this request on the grounds that, to the extent it seeks
13 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
14 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
15 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
16 action, and not reasonably calculated to lead to the discovery of admissible evidence.

17 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
18 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
19 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
20 of the alleged class period is November 25, 2007.

21 Responding Party objects to the extent this request seeks documents that are no longer
22 active or readily accessible in electronic form which renders this request overly broad and unduly
23 burdensome.

24 Responding Party objects to the extent this request seeks documents or information that is
25 not within the possession, custody, or control of Responding Party.

26 Responding Party objects to the extent this request seeks documents or information that
27 require discovery of information and materials from third-parties or sources that are equally if not
28 more accessible to Plaintiffs.

1 Responding Party objects on the grounds that, to the extent this request seeks documents
 2 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 3 information that is not relevant to the claim or defense of any party, not relevant to the subject
 4 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 5 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 6 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

7 Responding Party objects on the grounds that, to the extent Responding Party produces
 8 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
 9 produced again.

10 Responding Party objects that to the extent documents responsive to this request have
 11 previously been produced, they will not be produced again.

12 Subject to and without waiving the general and specific objections stated above,
 13 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 14 identify documents responsive to this request within the Limitations Period and, if any, will
 15 produce non-privileged, responsive documents.

16 **REQUEST NO. 28:**

17 For each of your employees who has or had any non-clerical responsibility for
 18 recommending, reviewing, setting or approving prices, price increase announcements, bids or
 19 quotes for the sale of CRTs or CRT Products, or any other involvement in the production,
 20 marketing, sale or distribution of CRTs or CRT Products:

- 21 a. all copies of electronic and manual diaries, calendars, appointment books, “to do”
- 22 lists, day timers or appointment notes;
- 23 b. all copies of trip and travel logs, records or other supporting documents;
- 24 c. all copies of expense reports or other supporting documents;
- 25 d. all copies of telephone number logs, directories, notebooks, Rolodex cards or
- 26 related memoranda;
- 27 e. all bills, statements, records and supporting documents concerning long distance or
- 28 cellular telephone calls;

- 1 f. all documents relating to membership in any trade association or industry group;
 2 and,
 3 g. the complete personnel file for that employee.

4 **RESPONSE TO REQUEST NO. 28:**

5 Responding Party reasserts and incorporates each of the General Objections and
 6 Objections to Definitions and Instructions set forth above.

7 Responding Party objects to this request on the grounds that it is overly broad, unduly
 8 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 9 including to the extent that it seeks the discovery of documents regarding Responding Party's
 10 sales outside of the United States and unrelated to United States commerce, as such sales are
 11 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 12 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 13 evidence.

14 Responding Party objects to this request on the grounds that it seeks production of
 15 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 16 common interest privilege, or by any other applicable doctrine or privilege.

17 Responding Party objects to this request on the grounds it seeks information and/or
 18 documents that would disclose confidential information protected by any and all rights of privacy
 19 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 20 from disclosure because to do so would cause Responding Party to violate legal and/or
 21 contractual obligations to any other persons or entities.

22 Responding Party objects to this request on the grounds that, to the extent it seeks
 23 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 24 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 25 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 26 action, and not reasonably calculated to lead to the discovery of admissible evidence.

27 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
 28 and not relevant, rendering the request not reasonably calculated to lead to the discovery of

1 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
2 of the alleged class period is November 25, 2007.

3 Responding Party objects to the extent this request seeks documents that are no longer
4 active or readily accessible in electronic form which renders this request overly broad and unduly
5 burdensome.

6 Responding Party objects that the phrase “non-clerical responsibility” is vague,
7 ambiguous, and unintelligible, rendering the request overly broad and unduly burdensome, not
8 relevant and not reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects to the extent this request seeks documents or information that
10 require discovery of information and materials from third-parties or sources that are equally if not
11 more accessible to Plaintiffs.

12 Responding Party objects on the grounds that, to the extent this request seeks documents
13 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
14 information that is not relevant to the claim or defense of any party, not relevant to the subject
15 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
16 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
17 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

18 Responding Party objects on the grounds that, to the extent Responding Party produces
19 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
20 produced again.

21 Responding Party objects that to the extent documents responsive to this request have
22 previously been produced, they will not be produced again.

23 Subject to and without waiving the general and specific objections stated above,
24 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
25 identify documents responsive to this request within the Limitations Period and, if any, will
26 produce non-privileged, responsive documents.

27 **REQUEST NO. 29:**

28 Documents sufficient to show the name and address of each trade association (including

committees and subcommittees) relating to CRTs or CRT Products of which you or any of your employees are or have been a member, as well as documents sufficient to show dates of membership and dates of participation in committees or subcommittees.

RESPONSE TO REQUEST NO. 29:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of

1 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
2 of the alleged class period is November 25, 2007.

3 Responding Party objects to the extent this request seeks documents that are no longer
4 active or readily accessible in electronic form which renders this request overly broad and unduly
5 burdensome.

6 Responding Party objects to the extent this request seeks documents or information that is
7 not within the possession, custody, or control of Responding Party.

8 Responding Party objects to the extent this request seeks documents or information that
9 require discovery of information and materials from third-parties or sources that are equally if not
10 more accessible to Plaintiffs.

11 Responding Party objects on the grounds that, to the extent this request seeks documents
12 related to "CRTs," this request is overly broad, unduly burdensome, and purports to call for
13 information that is not relevant to the claim or defense of any party, not relevant to the subject
14 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
15 evidence. The Complaint alleges Plaintiffs purport to bring this action "on behalf of individuals
16 and entities that indirectly purchased Cathode Ray Tube Products." (Complaint, ¶ 1).

17 Responding Party objects on the grounds that, to the extent Responding Party produces
18 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
19 produced again.

20 Responding Party objects that to the extent documents responsive to this request have
21 previously been produced, they will not be produced again.

22 Subject to and without waiving the general and specific objections stated above,
23 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
24 identify documents responsive to this request within the Limitations Period and, if any, will
25 produce non-privileged, responsive documents.

26 **REQUEST NO. 30:**

27 All documents relating to meetings of each trade association and each of its committees or
28 subcommittees relating to CRTs or CRT Products, including all documents relating to any such

meeting attended by you and any other manufacturer CRTs or CRT Products, and all documents identifying the employees from your company who attended, the dates of attendance, and the subject matters discussed.

RESPONSE TO REQUEST NO. 30:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of

1 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
2 of the alleged class period is November 25, 2007.

3 Responding Party objects to the extent this request seeks documents that are no longer
4 active or readily accessible in electronic form which renders this request overly broad and unduly
5 burdensome.

6 Responding Party objects to the extent this request seeks documents or information that is
7 not within the possession, custody, or control of Responding Party.

8 Responding Party objects to the extent this request seeks documents or information that
9 require discovery of information and materials from third-parties or sources that are equally if not
10 more accessible to Plaintiffs.

11 Responding Party objects on the grounds that, to the extent this request seeks documents
12 related to "CRTs," this request is overly broad, unduly burdensome, and purports to call for
13 information that is not relevant to the claim or defense of any party, not relevant to the subject
14 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
15 evidence. The Complaint alleges Plaintiffs purport to bring this action "on behalf of individuals
16 and entities that indirectly purchased Cathode Ray Tube Products." (Complaint, ¶ 1).

17 Responding Party objects on the grounds that, to the extent Responding Party produces
18 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
19 produced again.

20 Responding Party objects that to the extent documents responsive to this request have
21 previously been produced, they will not be produced again.

22 Subject to and without waiving the general and specific objections stated above,
23 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
24 identify documents responsive to this request within the Limitations Period and, if any, will
25 produce non-privileged, responsive documents.

26 **REQUEST NO. 31:**

27 All studies, analyses, communications, presentations or other documents that you have
28 submitted to or received from any trade association regarding CRTs or CRT Products.

RESPONSE TO REQUEST NO. 31:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period is November 25, 2007.

Responding Party objects to the extent this request seeks documents that are no longer

1 active or readily accessible in electronic form which renders this request overly broad and unduly
2 burdensome.

3 Responding Party objects to the extent this request seeks documents or information that is
4 not within the possession, custody, or control of Responding Party.

5 Responding Party objects that the terms “studies,” and “analyses” are vague, ambiguous,
6 and unintelligible, rendering this request overly broad and unduly burdensome, not relevant and
7 not reasonably calculated to lead to the discovery of admissible evidence.

8 Responding Party objects to the extent this request seeks documents or information that
9 require discovery of information and materials from third-parties or sources that are equally if not
10 more accessible to Plaintiffs.

11 Responding Party objects on the grounds that, to the extent this request seeks documents
12 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
13 information that is not relevant to the claim or defense of any party, not relevant to the subject
14 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
15 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
16 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

17 Responding Party objects on the grounds that, to the extent Responding Party produces
18 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
19 produced again.

20 Responding Party objects that to the extent documents responsive to this request have
21 previously been produced, they will not be produced again.

22 Subject to and without waiving the general and specific objections stated above,
23 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
24 identify documents responsive to this request within the Limitations Period and, if any, will
25 produce non-privileged, responsive documents.

26 **REQUEST NO. 32:**

27 All statements, announcements, disclosures or press releases issued by you or any of your
28 competitors relating to CRTs or CRT Products.

RESPONSE TO REQUEST NO. 32:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period is November 25, 2007.

Responding Party objects that the definition of the terms "you" and "your" are vague,

1 ambiguous, and unintelligible, rendering the request overly broad and unduly burdensome, not
2 relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects to the extent this request seeks documents that are no longer
4 active or readily accessible in electronic form which renders this request overly broad and unduly
5 burdensome.

6 Responding Party objects to the extent this request seeks documents or information that is
7 not within the possession, custody, or control of Responding Party. Responding Party objects to
8 the extent this request seeks documents or information that require discovery of information and
9 materials from third-parties or sources that are equally if not more accessible to Plaintiffs.

10 Responding Party objects on the grounds that, to the extent this request seeks documents
11 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
12 information that is not relevant to the claim or defense of any party, not relevant to the subject
13 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
14 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
15 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

16 Responding Party objects on the grounds that, to the extent Responding Party produces
17 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
18 produced again.

19 Responding Party objects that to the extent documents responsive to this request have
20 previously been produced, they will not be produced again.

21 Subject to and without waiving the general and specific objections stated above,
22 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
23 identify documents responsive to this request within the Limitations Period and, if any, will
24 produce non-privileged, responsive documents.

25 **REQUEST NO. 33:**

26 All documents relating to your policies or practices directed toward compliance with the
27 United States antitrust laws, including any statements signed by your employees with pricing,
28 sales or marketing responsibility for CRTs or CRT Products, acknowledging their receipt of and

1 compliance with your antitrust compliance policy.

2 **RESPONSE TO REQUEST NO. 33:**

3 Responding Party reasserts and incorporates each of the General Objections and
4 Objections to Definitions and Instructions set forth above.

5 Responding Party objects to this request on the grounds that it is overly broad, unduly
6 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
7 including to the extent that it seeks the discovery of documents regarding Responding Party's
8 sales outside of the United States and unrelated to United States commerce, as such sales are
9 beyond the scope of this litigation and thereby render the Document Requests overly broad,
10 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Responding Party objects to this request on the grounds that it seeks production of
13 documents protected by the attorney-client privilege, work product doctrine, joint defense or
14 common interest privilege, or by any other applicable doctrine or privilege.

15 Responding Party objects to this request on the grounds it seeks information and/or
16 documents that would disclose confidential information protected by any and all rights of privacy
17 under the United States Constitution or any other applicable law, or that is otherwise prohibited
18 from disclosure because to do so would cause Responding Party to violate legal and/or
19 contractual obligations to any other persons or entities.

20 Responding Party objects to this request on the grounds that, to the extent it seeks
21 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
22 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
23 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
24 action, and not reasonably calculated to lead to the discovery of admissible evidence.

25 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
26 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
27 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
28 of the alleged class period is November 25, 2007.

1 Responding Party objects to the extent this request seeks documents that are no longer
2 active or readily accessible in electronic form which renders this request overly broad and unduly
3 burdensome.

4 Responding Party objects to the extent this request seeks documents or information that is
5 not within the possession, custody, or control of Responding Party.

6 Responding Party objects that the phrase “directed toward compliance” is vague,
7 ambiguous, and unintelligible, rendering this request overly broad and unduly burdensome, not
8 relevant and not reasonably calculated to lead to the discovery of admissible evidence.

9 Responding Party objects on the grounds that, to the extent this request seeks documents
10 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
11 information that is not relevant to the claim or defense of any party, not relevant to the subject
12 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
13 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
14 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

15 Subject to and without waiving the general and specific objections stated above,
16 Responding Party responds that it will make reasonable efforts to identify documents responsive
17 to this request within the Limitations Period and, if any, will produce non-privileged, responsive
18 documents.

19 **REQUEST NO. 34:**

20 All documents relating to, prepared for, submitted to, or received from any foreign
21 governmental or legislative body, including the Canadian Competition Bureau, the European
22 Commission, the Hungarian Competition Authority, the Japanese Fair Trade Commission, the
23 Korean Fair Trade Commission, or any agency or representative body of any foreign country,
24 state or other political subdivision, or any law enforcement agency, authority or commission in
25 any foreign country, relating to the production, sale, marketing, pricing or distribution of CRTs or
26 CRT Products. This request includes all documents relating to proffers, transcripts, notes,
27 summaries, testimony, witness statements, or responses to requests for information that you
28 produced to any foreign governmental agency or foreign grand jury, including any documents

1 produced as part of any plea bargain negotiations or in connection with any application for or
2 grant of amnesty or leniency.

3 **RESPONSE TO REQUEST NO. 34:**

4 Responding Party reasserts and incorporates each of the General Objections and
5 Objections to Definitions and Instructions set forth above.

6 Responding Party objects to this request on the grounds that it is overly broad, unduly
7 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
8 including to the extent that it seeks the discovery of documents regarding Responding Party's
9 sales outside of the United States and unrelated to United States commerce, as such sales are
10 beyond the scope of this litigation and thereby render the Document Requests overly broad,
11 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Responding Party objects to this request on the grounds that it seeks information in excess
14 of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no
15 discovery shall be conducted in this case (including, without limitation, document requests,
16 interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury
17 proceedings concerning CRTs or CRT products, including any party's or witness's
18 communications with the United States, or with any grand jury investigating CRTs or CRT
19 products, except by the order of the Court upon good cause shown and consistent with governing
20 law." Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

21 Responding Party objects to this request on the grounds that it seeks production of
22 documents protected by the attorney-client privilege, work product doctrine, joint defense or
23 common interest privilege, or by any other applicable doctrine or privilege.

24 Responding Party objects to this request on the grounds it seeks information and/or
25 documents that would disclose confidential information protected by any and all rights of privacy
26 under the United States Constitution or any other applicable law, or that is otherwise prohibited
27 from disclosure because to do so would cause Responding Party to violate legal and/or
28 contractual obligations to any other persons or entities.

1 Responding Party objects to this request on the grounds that, to the extent it seeks
 2 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
 3 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 4 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 5 action, and not reasonably calculated to lead to the discovery of admissible evidence.

6 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
 7 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 8 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
 9 of the alleged class period is November 25, 2007.

10 Responding Party objects to the extent this request seeks documents that are no longer
 11 active or readily accessible in electronic form which renders this request overly broad and unduly
 12 burdensome.

13 Responding Party objects to this request on the grounds that discovery of documents and
 14 information related to foreign antitrust laws are not relevant to the allegations in the Complaint,
 15 thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to
 16 lead to the discovery of admissible evidence.

17 Responding Party objects on the grounds that, to the extent this request seeks documents
 18 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 19 information that is not relevant to the claim or defense of any party, not relevant to the subject
 20 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 21 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 22 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

23 Subject to and without waiving the general and specific objections stated above,
 24 Responding Party declines to produce documents that may be responsive to this request.

25 **REQUEST NO. 35:**

26 All documents relating to proffers, transcripts, notes, summaries, testimony, witness
 27 statements, or responses to requests for information that you produced or were seized by any
 28 foreign governmental agency in Canada, the European Union, India, Hong Kong, Hungary,

1 Thailand, Malaysia, Indonesia, Korea, Japan, Singapore, China or Taiwan.

2 **RESPONSE TO REQUEST NO. 35:**

3 Responding Party reasserts and incorporates each of the General Objections and
4 Objections to Definitions and Instructions set forth above.

5 Responding Party objects to this request on the grounds that it is overly broad, unduly
6 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
7 including to the extent that it seeks the discovery of documents regarding Responding Party's
8 sales outside of the United States and unrelated to United States commerce, as such sales are
9 beyond the scope of this litigation and thereby render the Document Requests overly broad,
10 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Responding Party objects to this request on the grounds that it seeks information in excess
13 of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no
14 discovery shall be conducted in this case (including, without limitation, document requests,
15 interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury
16 proceedings concerning CRTs or CRT products, including any party's or witness's
17 communications with the United States, or with any grand jury investigating CRTs or CRT
18 products, except by the order of the Court upon good cause shown and consistent with governing
19 law." Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

20 Responding Party objects to this request on the grounds that it seeks production of
21 documents protected by the attorney-client privilege, work product doctrine, joint defense or
22 common interest privilege, or by any other applicable doctrine or privilege.

23 Responding Party objects to this request on the grounds it seeks information and/or
24 documents that would disclose confidential information protected by any and all rights of privacy
25 under the United States Constitution or any other applicable law, or that is otherwise prohibited
26 from disclosure because to do so would cause Responding Party to violate legal and/or
27 contractual obligations to any other persons or entities.

28 Responding Party objects to this request on the grounds that, to the extent it seeks

documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the “Relevant Time Period” is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period is November 25, 2007.

Responding Party objects to the extent this request seeks documents that are no longer active or readily accessible in electronic form which renders this request overly broad and unduly burdensome.

Responding Party objects to this request on the grounds that discovery of documents and information related to foreign antitrust laws are not relevant to the allegations in the Complaint, thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that, to the extent this request seeks documents related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

Subject to and without waiving the general and specific objections stated above, Responding Party declines to produce documents that may be responsive to this request.

REQUEST NO. 36:

Copies of all subpoenas or requests for production of documents issued by any foreign governmental or legislative investigative body referring or relating to CRTs or CRT Products during the relevant period.

RESPONSE TO REQUEST NO. 36:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks information in excess of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no discovery shall be conducted in this case (including, without limitation, document requests, interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury proceedings concerning CRTs or CRT products, including any party's or witness's communications with the United States, or with any grand jury investigating CRTs or CRT products, except by the order of the Court upon good cause shown and consistent with governing law." Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and

1 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
 2 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
 3 action, and not reasonably calculated to lead to the discovery of admissible evidence.

4 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
 5 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
 6 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
 7 of the alleged class period is November 25, 2007.

8 Responding Party objects to the extent this request seeks documents that are no longer
 9 active or readily accessible in electronic form which renders this request overly broad and unduly
 10 burdensome.

11 Responding Party objects to this request on the grounds that discovery of documents and
 12 information related to foreign antitrust laws are not relevant to the allegations in the Complaint,
 13 thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to
 14 lead to the discovery of admissible evidence.

15 Responding Party objects on the grounds that, to the extent this request seeks documents
 16 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 17 information that is not relevant to the claim or defense of any party, not relevant to the subject
 18 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 19 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 20 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

21 Subject to and without waiving the general and specific objections stated above,
 22 Responding Party declines to produce documents that may be responsive to this request.

23 **REQUEST NO. 37:**

24 All documents relating to, prepared for, submitted to, or received by you as a result of any
 25 investigation or research conducted either internally or by an outside entity with respect to price
 26 fixing, price manipulation or manipulation of production or capacity of CRTs or CRT Products.

27 **RESPONSE TO REQUEST NO. 37:**

28 Responding Party reasserts and incorporates each of the General Objections and

1 Objections to Definitions and Instructions set forth above.

2 Responding Party objects to this request on the grounds that it is overly broad, unduly
3 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
4 including to the extent that it seeks the discovery of documents regarding Responding Party's
5 sales outside of the United States and unrelated to United States commerce, as such sales are
6 beyond the scope of this litigation and thereby render the Document Requests overly broad,
7 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Responding Party objects to this request on the grounds that it seeks information in excess
10 of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that "no
11 discovery shall be conducted in this case (including, without limitation, document requests,
12 interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury
13 proceedings concerning CRTs or CRT products, including any party's or witness's
14 communications with the United States, or with any grand jury investigating CRTs or CRT
15 products, except by the order of the Court upon good cause shown and consistent with governing
16 law." Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

17 Responding Party objects to this request on the grounds that it seeks production of
18 documents protected by the attorney-client privilege, work product doctrine, joint defense or
19 common interest privilege, or by any other applicable doctrine or privilege.

20 Responding Party objects to this request on the grounds it seeks information and/or
21 documents that would disclose confidential information protected by any and all rights of privacy
22 under the United States Constitution or any other applicable law, or that is otherwise prohibited
23 from disclosure because to do so would cause Responding Party to violate legal and/or
24 contractual obligations to any other persons or entities.

25 Responding Party objects to this request on the grounds that, to the extent it seeks
26 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
27 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
28 relevant to the claim or defense of any party, not relevant to the subject matter involved in this

1 action, and not reasonably calculated to lead to the discovery of admissible evidence.

2 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
3 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
4 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
5 of the alleged class period is November 25, 2007.

6 Responding Party objects to the extent this request seeks documents that are no longer
7 active or readily accessible in electronic form which renders this request overly broad and unduly
8 burdensome.

9 Responding Party objects to this request on the grounds that discovery of documents and
10 information related to foreign antitrust laws are not relevant to the allegations in the Complaint,
11 thus rendering this request overly broad, unduly burdensome, and not reasonably calculated to
12 lead to the discovery of admissible evidence.

13 Responding Party objects on the grounds that, to the extent this request seeks documents
14 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
15 information that is not relevant to the claim or defense of any party, not relevant to the subject
16 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
17 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
18 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

19 Subject to and without waiving the general and specific objections stated above,
20 Responding Party declines to produce documents that may be responsive to this request.

21 **REQUEST NO. 38:**

22 All documents relating to the termination, retirement, discipline, discharge or suspension
23 of any director, officer, or employee who had any responsibility relating to the production,
24 manufacture, distribution, marketing, pricing or sale of CRTs or CRT Products.

25 **RESPONSE TO REQUEST NO. 38:**

26 Responding Party reasserts and incorporates each of the General Objections and
27 Objections to Definitions and Instructions set forth above.

28 Responding Party objects to this request on the grounds that it is overly broad, unduly

1 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
2 including to the extent that it seeks the discovery of documents regarding Responding Party's
3 sales outside of the United States and unrelated to United States commerce, as such sales are
4 beyond the scope of this litigation and thereby render the Document Requests overly broad,
5 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
6 evidence.

7 Responding Party objects to this request on the grounds that it seeks production of
8 documents protected by the attorney-client privilege, work product doctrine, joint defense or
9 common interest privilege, or by any other applicable doctrine or privilege.

10 Responding Party objects to this request on the grounds it seeks information and/or
11 documents that would disclose confidential information protected by any and all rights of privacy
12 under the United States Constitution or any other applicable law, or that is otherwise prohibited
13 from disclosure because to do so would cause Responding Party to violate legal and/or
14 contractual obligations to any other persons or entities.

15 Responding Party objects to this request on the grounds that, to the extent it seeks
16 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
17 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
18 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
19 action, and not reasonably calculated to lead to the discovery of admissible evidence.

20 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
21 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
22 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
23 of the alleged class period is November 25, 2007.

24 Responding Party objects to the extent this request seeks documents that are no longer
25 active or readily accessible in electronic form which renders this request overly broad and unduly
26 burdensome.

27 Responding Party objects on the grounds that, to the extent this request seeks documents
28 not related to the allegations in the Complaint, this request is overly broad and unduly

1 burdensome, and purports to call for information that is not relevant to the claim or defense of
 2 any party, not relevant to the subject matter involved in this action, and not reasonably calculated
 3 to lead to the discovery of admissible evidence.

4 Responding Party objects to this request on the grounds that it seeks information in excess
 5 of the limited scope of discovery permitted by the Stay Order, as the Stay Order states that “no
 6 discovery shall be conducted in this case (including, without limitation, document requests,
 7 interrogatories, requests to admit, or depositions) that reflects, refers to, or relates to grand jury
 8 proceedings concerning CRTs or CRT products, including any party’s or witness’s
 9 communications with the United States, or with any grand jury investigating CRTs or CRT
 10 products, except by the order of the Court upon good cause shown and consistent with governing
 11 law.” Stipulation and Order to Extend Limited Discovery Stay, ¶ 3 (January 5, 2010).

12 Responding Party objects on the grounds that, to the extent this request seeks documents
 13 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 14 information that is not relevant to the claim or defense of any party, not relevant to the subject
 15 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 16 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 17 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

18 Subject to and without waiving the general and specific objections stated above,
 19 Responding Party declines to produce documents that may be responsive to this request.

20 **REQUEST NO. 39:**

21 All documents referring or relating to the named plaintiffs in this litigation.

22 **RESPONSE TO REQUEST NO. 39:**

23 Responding Party reasserts and incorporates each of the General Objections and
 24 Objections to Definitions and Instructions set forth above.

25 Responding Party objects to this request on the grounds that it is overly broad, unduly
 26 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 27 including to the extent that it seeks the discovery of documents regarding Responding Party’s
 28 sales outside of the United States and unrelated to United States commerce, as such sales are

1 beyond the scope of this litigation and thereby render the Document Requests overly broad,
2 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request on the grounds that it seeks production of
5 documents protected by the attorney-client privilege, work product doctrine, joint defense or
6 common interest privilege, or by any other applicable doctrine or privilege.

7 Responding Party objects to this request on the grounds it seeks information and/or
8 documents that would disclose confidential information protected by any and all rights of privacy
9 under the United States Constitution or any other applicable law, or that is otherwise prohibited
10 from disclosure because to do so would cause Responding Party to violate legal and/or
11 contractual obligations to any other persons or entities.

12 Responding Party objects to this request on the grounds that, to the extent it seeks
13 documents regarding “CRT Products,” as distinguished from “CRTs,” this request is vague and
14 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
15 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
16 action, and not reasonably calculated to lead to the discovery of admissible evidence.

17 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
18 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
19 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
20 of the alleged class period is November 25, 2007.

21 Responding Party objects to the extent this request seeks documents or information that is
22 not within the possession, custody, or control of Responding Party.

23 Responding Party objects to the extent this request seeks documents or information that
24 require discovery of information and materials from third-parties or sources that are equally if not
25 more accessible to Plaintiffs.

26 Subject to and without waiving the general and specific objections stated above,
27 Responding Party declines to produce documents that may be responsive to this request.

REQUEST NO. 40:

All documents that you claim would have been available to the plaintiffs or any purchaser of CRTs or CRT Products prior to November 2007, which should have caused the Plaintiffs or any such purchaser to investigate whether there was a conspiracy to fix, raise, maintain or stabilize the prices or to control or restrict sales of CRTs or CRT Products in the United States.

RESPONSE TO REQUEST NO. 40:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

1 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
2 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
3 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
4 of the alleged class period is November 25, 2007.

5 Responding Party objects to the extent this request seeks documents that are no longer
6 active or readily accessible in electronic form which renders this request overly broad and unduly
7 burdensome.

8 Responding Party objects to the extent this request seeks documents or information that is
9 not within the possession, custody, or control of Responding Party.

10 Responding Party objects to the extent this request seeks documents or information that
11 require discovery of information and materials from third-parties or sources that are equally if not
12 more accessible to Plaintiffs.

13 Responding Party objects to this request as inappropriately propounded as a document
14 request, as it seeks information more easily obtainable through other means and/or as to which
15 Plaintiffs bear the burden of proof.

16 Responding Party objects to the extent this request is argumentative and assumes facts not
17 in evidence.

18 Subject to and without waiving the general and specific objections stated above,
19 Responding Party declines to produce documents that may be responsive to this request.

20 **REQUEST NO. 41:**

21 All documents relating to any refusal by you or any other manufacturer of CRTs or CRT
22 Products to quote or bid for business or to supply CRTs or CRT Products to a customer, or to
23 intentionally quote a price or bid you believed or the other manufacturer believed would be higher
24 than a quote or bid by another manufacturer or seller of CRTs or CRT Products.

25 **RESPONSE TO REQUEST NO. 41:**

26 Responding Party reasserts and incorporates each of the General Objections and
27 Objections to Definitions and Instructions set forth above.

28 Responding Party objects to this request on the grounds that it is overly broad, unduly

1 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
2 including to the extent that it seeks the discovery of documents regarding Responding Party's
3 sales outside of the United States and unrelated to United States commerce, as such sales are
4 beyond the scope of this litigation and thereby render the Document Requests overly broad,
5 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
6 evidence.

7 Responding Party objects to this request on the grounds that it seeks production of
8 documents protected by the attorney-client privilege, work product doctrine, joint defense or
9 common interest privilege, or by any other applicable doctrine or privilege.

10 Responding Party objects to this request on the grounds it seeks information and/or
11 documents that would disclose confidential information protected by any and all rights of privacy
12 under the United States Constitution or any other applicable law, or that is otherwise prohibited
13 from disclosure because to do so would cause Responding Party to violate legal and/or
14 contractual obligations to any other persons or entities.

15 Responding Party objects to this request on the grounds that, to the extent it seeks
16 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
17 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
18 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
19 action, and not reasonably calculated to lead to the discovery of admissible evidence.

20 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
21 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
22 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
23 of the alleged class period is November 25, 2007.

24 Responding Party objects to the extent this request seeks documents or information that is
25 not within the possession, custody, or control of Responding Party.

26 Responding Party objects to the extent this request seeks documents or information that
27 require discovery of information and materials from third-parties or sources that are equally if not
28 more accessible to Plaintiffs.

1 Responding Party objects that the terms “refusal,” “quote,” “bid,” “supply,” and
 2 “intentionally” are vague, ambiguous, and unintelligible, rendering the request overly broad and
 3 unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of
 4 admissible evidence.

5 Responding Party objects to the extent this request calls for Responding Party to answer
 6 on behalf of third parties by seeking documents relating to what “the other manufacturer
 7 believed.” Responding Party will respond on behalf of Hitachi Asia, Ltd. only.

8 Responding Party objects on the grounds that, to the extent this request seeks documents
 9 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
 10 information that is not relevant to the claim or defense of any party, not relevant to the subject
 11 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
 12 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
 13 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

14 Responding Party objects on the grounds that, to the extent Responding Party produces
 15 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
 16 produced again.

17 Responding Party objects that to the extent documents responsive to this request have
 18 previously been produced, they will not be produced again.

19 Subject to and without waiving the general and specific objections stated above,
 20 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 21 identify documents responsive to this request within the Limitations Period and, if any, will
 22 produce non-privileged, responsive documents.

23 **REQUEST NO. 42:**

24 All documents and electronic data that relate to the relationship between the sale price of
 25 CRT Products and the cost of CRTs and/or any other component of CRT Products.

26 **RESPONSE TO REQUEST NO. 42:**

27 Responding Party reasserts and incorporates each of the General Objections and
 28 Objections to Definitions and Instructions set forth above.

1 Responding Party objects to this request on the grounds that it is overly broad, unduly
2 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
3 including to the extent that it seeks the discovery of documents regarding Responding Party's
4 sales outside of the United States and unrelated to United States commerce, as such sales are
5 beyond the scope of this litigation and thereby render the Document Requests overly broad,
6 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
7 evidence.

8 Responding Party objects to this request on the grounds that it seeks production of
9 documents protected by the attorney-client privilege, work product doctrine, joint defense or
10 common interest privilege, or by any other applicable doctrine or privilege.

11 Responding Party objects to this request on the grounds it seeks information and/or
12 documents that would disclose confidential information protected by any and all rights of privacy
13 under the United States Constitution or any other applicable law, or that is otherwise prohibited
14 from disclosure because to do so would cause Responding Party to violate legal and/or
15 contractual obligations to any other persons or entities.

16 Responding Party objects to this request on the grounds that, to the extent it seeks
17 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
18 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
19 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
20 action, and not reasonably calculated to lead to the discovery of admissible evidence.

21 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
22 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
23 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
24 of the alleged class period is November 25, 2007.

25 Responding Party objects to the extent this request seeks documents or information that is
26 not within the possession, custody, or control of Responding Party.

27 Responding Party objects to the extent this request seeks documents or information that
28 require discovery of information and materials from third-parties or sources that are equally if not

1 more accessible to Plaintiffs.

2 Responding Party objects to the extent this request seeks documents that are no longer
3 active or readily accessible in electronic form which renders this request overly broad and unduly
4 burdensome.

5 Responding Party objects that the terms “relate to the relationship” and “component” are
6 vague, ambiguous, and unintelligible, rendering the Document Request overly broad and unduly
7 burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible
8 evidence.

9 Responding Party objects to this request to the extent this request is duplicative of
10 Requests Nos. 5, 8, 14 and 23 of the Document Requests, to the extent this request seeks
11 documents related to prices, sales data, or conditions of supply and demand for CRTs or CRT
12 Products.

13 Responding Party objects on the grounds that, to the extent Responding Party produces
14 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
15 produced again.

16 Responding Party objects that to the extent documents responsive to this request have
17 previously been produced, they will not be produced again.

18 Subject to and without waiving the general and specific objections stated above,
19 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
20 identify documents responsive to this request within the Limitations Period and, if any, will
21 produce non-privileged, responsive documents.

22 **REQUEST NO. 43:**

23 All documents and electronic data, including, but not limited to, any studies or analyses,
24 that reflect, refer, or relate to how the price of CRTs or CRT Products sold by you or by any of
25 your competitors affected the prices of CRT Products resold by third parties to others including,
26 but not limited, end-user purchasers of CRT Products such as the classes identified in the Indirect
27 Purchaser Plaintiffs’ Consolidated Amended Complaint.

RESPONSE TO REQUEST NO. 43:

Responding Party reasserts and incorporates each of the General Objections and Objections to Definitions and Instructions set forth above.

Responding Party objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence including to the extent that it seeks the discovery of documents regarding Responding Party's sales outside of the United States and unrelated to United States commerce, as such sales are beyond the scope of this litigation and thereby render the Document Requests overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds that it seeks production of documents protected by the attorney-client privilege, work product doctrine, joint defense or common interest privilege, or by any other applicable doctrine or privilege.

Responding Party objects to this request on the grounds it seeks information and/or documents that would disclose confidential information protected by any and all rights of privacy under the United States Constitution or any other applicable law, or that is otherwise prohibited from disclosure because to do so would cause Responding Party to violate legal and/or contractual obligations to any other persons or entities.

Responding Party objects to this request on the grounds that, to the extent it seeks documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and ambiguous, overly broad and unduly burdensome, and purports to call for information that is not relevant to the claim or defense of any party, not relevant to the subject matter involved in this action, and not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects on the grounds that the "Relevant Time Period" is overly broad and not relevant, rendering the request not reasonably calculated to lead to the discovery of admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit of the alleged class period is November 25, 2007.

Responding Party objects to the extent this request seeks documents or information that is

1 not within the possession, custody, or control of Responding Party.

2 Responding Party objects to the extent this request seeks documents or information that
3 require discovery of information and materials from third-parties or sources that are equally if not
4 more accessible to Plaintiffs.

5 Responding Party objects to the extent this request seeks documents that are no longer
6 active or readily accessible in electronic form which renders this request overly broad and unduly
7 burdensome.

8 Responding Party objects that the phrases “studies or analyses,” “reflect, refer, or relate,”
9 “affected,” “resold,” and “end-user purchasers” are vague, ambiguous, and unintelligible,
10 rendering the request overly broad and unduly burdensome, not relevant and not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 Responding Party objects to this request to the extent this request is duplicative of
13 Requests Nos. 5, 8, 14 and 23 of the Document Requests, to the extent this request seeks
14 documents related to prices, sales data, or conditions of supply and demand for CRTs or CRT
15 Products.

16 Responding Party objects on the grounds that, to the extent Responding Party produces
17 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
18 produced again.

19 Responding Party objects that to the extent documents responsive to this request have
20 previously been produced, they will not be produced again.

21 Subject to and without waiving the general and specific objections stated above,
22 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
23 identify documents responsive to this request within the Limitations Period and, if any, will
24 produce non-privileged, responsive documents.

25 **REQUEST NO. 44:**

26 All documents and electronic data, including, but not limited to, any studies or analyses
27 that reflect, refer or relate to the extent to which original equipment manufacturers, original
28 design manufacturers, retailers, distributors or any other entities involved in the manufacture,

1 distribution, or resale of CRT Products, pass through the cost of CRTs or CRT Products to their
2 respective customers.

3 **RESPONSE TO REQUEST NO. 44:**

4 Responding Party reasserts and incorporates each of the General Objections and
5 Objections to Definitions and Instructions set forth above.

6 Responding Party objects to this request on the grounds that it is overly broad, unduly
7 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
8 including to the extent that it seeks the discovery of documents regarding Responding Party's
9 sales outside of the United States and unrelated to United States commerce, as such sales are
10 beyond the scope of this litigation and thereby render the Document Requests overly broad,
11 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Responding Party objects to this request on the grounds that it seeks production of
14 documents protected by the attorney-client privilege, work product doctrine, joint defense or
15 common interest privilege, or by any other applicable doctrine or privilege.

16 Responding Party objects to this request on the grounds it seeks information and/or
17 documents that would disclose confidential information protected by any and all rights of privacy
18 under the United States Constitution or any other applicable law, or that is otherwise prohibited
19 from disclosure because to do so would cause Responding Party to violate legal and/or
20 contractual obligations to any other persons or entities.

21 Responding Party objects to this request on the grounds that, to the extent it seeks
22 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
23 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
24 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
25 action, and not reasonably calculated to lead to the discovery of admissible evidence.

26 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
27 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
28 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit

1 of the alleged class period is November 25, 2007.

2 Responding Party objects to the extent this request seeks documents or information that is
3 not within the possession, custody, or control of Responding Party.

4 Responding Party objects to the extent this request seeks documents or information that
5 require discovery of information and materials from third-parties or sources that are equally if not
6 more accessible to Plaintiffs.

7 Responding Party objects to the extent this request seeks documents that are no longer
8 active or readily accessible in electronic form which renders this request overly broad and unduly
9 burdensome.

10 Responding Party objects that the phrases “studies or analyses,” “reflect, refer, or relate,”
11 and “pass through” are vague, ambiguous, and unintelligible, rendering the request overly broad
12 and unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of
13 admissible evidence.

14 Responding Party objects that the phrase “pass through” calls for a legal conclusion.

15 Responding Party objects on the grounds that, to the extent Responding Party produces
16 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
17 produced again.

18 Responding Party objects that to the extent documents responsive to this request have
19 previously been produced, they will not be produced again.

20 Subject to and without waiving the general and specific objections stated above,
21 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
22 identify documents responsive to this request within the Limitations Period and, if any, will
23 produce non-privileged, responsive documents.

24 **REQUEST NO. 45:**

25 All documents and electronic data, including, but not limited to, any studies or analyses
26 that reflect, refer or relate to the distribution channels for CRTs or CRT Products from you to end
27 users such as the classes identified in the Indirect Purchasers’ Consolidated Amended Complaint,
28 including, but not limited to, the specific entities in the distribution chain(s); the CRTs or CRT

1 Products sold by these entities; and the amount of CRTs or CRT Products sold by these entities.

2 **RESPONSE TO REQUEST NO. 45:**

3 Responding Party reasserts and incorporates each of the General Objections and
4 Objections to Definitions and Instructions set forth above.

5 Responding Party objects to this request on the grounds that it is overly broad, unduly
6 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
7 including to the extent that it seeks the discovery of documents regarding Responding Party's
8 sales outside of the United States and unrelated to United States commerce, as such sales are
9 beyond the scope of this litigation and thereby render the Document Requests overly broad,
10 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Responding Party objects to this request on the grounds that it seeks production of
13 documents protected by the attorney-client privilege, work product doctrine, joint defense or
14 common interest privilege, or by any other applicable doctrine or privilege.

15 Responding Party objects to this request on the grounds it seeks information and/or
16 documents that would disclose confidential information protected by any and all rights of privacy
17 under the United States Constitution or any other applicable law, or that is otherwise prohibited
18 from disclosure because to do so would cause Responding Party to violate legal and/or
19 contractual obligations to any other persons or entities.

20 Responding Party objects to this request on the grounds that, to the extent it seeks
21 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
22 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not
23 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
24 action, and not reasonably calculated to lead to the discovery of admissible evidence.

25 Responding Party objects on the grounds that the "Relevant Time Period" is overly broad
26 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
27 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
28 of the alleged class period is November 25, 2007.

1 Responding Party objects to the extent this request seeks documents or information that is
2 not within the possession, custody, or control of Responding Party.

3 Responding Party objects to the extent this request seeks documents or information that
4 require discovery of information and materials from third-parties or sources that are equally if not
5 more accessible to Plaintiffs.

6 Responding Party objects to the extent this request seeks documents that are no longer
7 active or readily accessible in electronic form which renders this request overly broad and unduly
8 burdensome.

9 Responding Party objects that the phrases “studies or analyses,” “reflect, refer, or relate,”
10 “distribution channels,” “end users,” and “distribution chain(s)” are vague, ambiguous, and
11 unintelligible, rendering the request overly broad and unduly burdensome, not relevant and not
12 reasonably calculated to lead to the discovery of admissible evidence.

13 Responding Party objects to this request to the extent this request is duplicative of
14 Requests Nos. 25, 27, and 28 of the Document Requests, to the extent this request seeks
15 documents related to communications or meetings with distributors or about distribution
16 channels, or seeks any documents related to distribution channels that are already identified in
17 Request No. 28.

18 Responding Party objects on the grounds that, to the extent this request seeks documents
19 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
20 information that is not relevant to the claim or defense of any party, not relevant to the subject
21 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
22 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
23 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

24 Responding Party objects on the grounds that, to the extent Responding Party produces
25 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be
26 produced again.

27 Responding Party objects that to the extent documents responsive to this request have
28 previously been produced, they will not be produced again.

1 Subject to and without waiving the general and specific objections stated above,
 2 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
 3 identify documents responsive to this request within the Limitations Period and, if any, will
 4 produce non-privileged, responsive documents.

5 **REQUEST NO. 46:**

6 All documents and electronic data, including, but not limited to, any studies or analyses
 7 that reflect, refer, or relate to retail prices, resale prices, or street prices of CRTs or CRT Products.

8 **RESPONSE TO REQUEST NO. 46:**

9 Responding Party reasserts and incorporates each of the General Objections and
 10 Objections to Definitions and Instructions set forth above.

11 Responding Party objects to this request on the grounds that it is overly broad, unduly
 12 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence
 13 including to the extent that it seeks the discovery of documents regarding Responding Party's
 14 sales outside of the United States and unrelated to United States commerce, as such sales are
 15 beyond the scope of this litigation and thereby render the Document Requests overly broad,
 16 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
 17 evidence.

18 Responding Party objects to this request on the grounds that it seeks production of
 19 documents protected by the attorney-client privilege, work product doctrine, joint defense or
 20 common interest privilege, or by any other applicable doctrine or privilege.

21 Responding Party objects to this request on the grounds it seeks information and/or
 22 documents that would disclose confidential information protected by any and all rights of privacy
 23 under the United States Constitution or any other applicable law, or that is otherwise prohibited
 24 from disclosure because to do so would cause Responding Party to violate legal and/or
 25 contractual obligations to any other persons or entities.

26 Responding Party objects to this request on the grounds that, to the extent it seeks
 27 documents regarding "CRT Products," as distinguished from "CRTs," this request is vague and
 28 ambiguous, overly broad and unduly burdensome, and purports to call for information that is not

1 relevant to the claim or defense of any party, not relevant to the subject matter involved in this
2 action, and not reasonably calculated to lead to the discovery of admissible evidence.

3 Responding Party objects on the grounds that the “Relevant Time Period” is overly broad
4 and not relevant, rendering the request not reasonably calculated to lead to the discovery of
5 admissible evidence as the Complaint does not allege a continuing conspiracy and the outer limit
6 of the alleged class period is November 25, 2007.

7 Responding Party objects to the extent this request seeks documents or information that is
8 not within the possession, custody, or control of Responding Party.

9 Responding Party objects to the extent this request seeks documents or information that
10 require discovery of information and materials from third-parties or sources that are equally if not
11 more accessible to Plaintiffs.

12 Responding Party objects to the extent this request seeks documents that are no longer
13 active or readily accessible in electronic form which renders this request overly broad and unduly
14 burdensome.

15 Responding Party objects that the phrases “studies or analyses,” “reflect, refer, or relate,”
16 “retail prices,” “resale prices,” and “street prices” are vague, ambiguous, and unintelligible,
17 rendering the request overly broad and unduly burdensome, not relevant and not reasonably
18 calculated to lead to the discovery of admissible evidence.

19 Responding Party objects to this request to the extent this request is duplicative of
20 Requests Nos. 5 and 8 of the Document Requests.

21 Responding Party objects on the grounds that, to the extent this request seeks documents
22 related to “CRTs,” this request is overly broad, unduly burdensome, and purports to call for
23 information that is not relevant to the claim or defense of any party, not relevant to the subject
24 matter involved in this action, and not reasonably calculated to lead to the discovery of admissible
25 evidence. The Complaint alleges Plaintiffs purport to bring this action “on behalf of individuals
26 and entities that indirectly purchased Cathode Ray Tube Products.” (Complaint, ¶ 1).

27 Responding Party objects on the grounds that, to the extent Responding Party produces
28 documents responsive to this request to Direct Purchaser Plaintiffs, such documents will not be

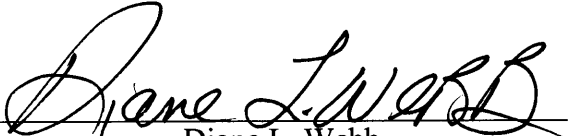
1 produced again.

2 Responding Party objects that to the extent documents responsive to this request have
3 previously been produced, they will not be produced again.

4 Subject to and without waiving the general and specific objections stated above,
5 Responding Party responds that it will make reasonable, not unduly burdensome efforts to
6 identify documents responsive to this request within the Limitations Period and, if any, will
7 produce non-privileged, responsive documents.

8
9 Dated: May 28, 2010

MORGAN, LEWIS & BOCKIUS LLP

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11 By 
12 Diane L. Webb

13 Attorneys for Defendants
14 HITACHI ASIA, LTD.
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